

CONSTRUCTION OF  
REMOTE FIXED FACILITY  
SOUTH PADRE ISLAND  
CAMERON COUNTY, TEXAS



**U.S. Department of Homeland Security  
United States Coast Guard  
2100 2<sup>nd</sup> Street, SW, Stop 7701  
Washington, DC 20593-7701**

June 2011



U.S. COAST GUARD  
FINDING OF NO SIGNIFICANT IMPACT (FONSI)

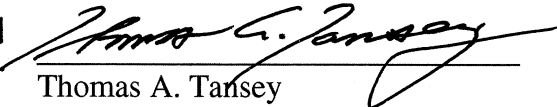
FOR

CONSTRUCTION OF REMOTE FIXED FACILITY SOUTH PADRE ISLAND  
CAMERON COUNTY, TEXAS


This project has been thoroughly reviewed by the U.S. Coast Guard (USCG) and it has been determined, by the undersigned, that this project will have no significant effect on the human environment.

The associated site-specific Environmental Assessment (EA) has been prepared to describe the Proposed Action and a range of reasonable alternatives, including the No Action Alternative. The No Action Alternative provides a baseline for comparing the Proposed Action with existing conditions. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA; 42 U.S.C. 4321, 4331, 4332), the Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 Code of Federal Regulations [CFR] Parts 1500 through 1508), Department of Homeland Security (DHS) Management Directive (MD) 023-01 (71 Federal Register 16790-16820 [April 4, 2006]), *Environmental Planning Program*, and the U.S. Coast Guard's policy guidelines for implementing NEPA, COMDTINST M16475.1D, *National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts*.

This Finding of No Significant Impact (FONSI) is based on the attached contractor-prepared EA, which has been independently evaluated by the USCG and determined to adequately and accurately discuss the environmental issues and impacts of the proposed project and provides sufficient evidence and analysis for determining that a Environmental Impact Statement is not required. The USCG takes full responsibility for the accuracy, scope, and content of the attached EA.

JUN 03 2011		Environmental Program Manager USCG Rescue 21 Project
Date	Thomas A. Tansey Environmental Reviewer	Title/Position

I have considered the information contained in the EA, which is the basis for this FONSI. Based on the information in the EA and this FONSI document, I agree that the proposed action, as described above and in the EA, will have no significant impact on the human environment.

JUN 03 2011		Deputy Project Manager USCG Rescue 21 Project
Date	Eugene G. Lockhart Responsible Official	Title/Position



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ACHP	Advisory Council on Historic Preservation
amsl	Above Mean Sea Level
AOR	Area of Responsibility
APE	Area of Potential Effect
AQCR	Air Quality Control Region
BMP	Best Management Practice
CAA	Clean Air Act
CB	Citizen Band Radio
CBRA	Coastal Barrier Resources Act
CCC	Coastal Coordination Council
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERL	Construction Engineering Research Laboratory
CFR	Code of Federal Regulations
CMP	Coastal Management Program
CO	Carbon Monoxide
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
dB	Decibel
dBA	A-weighted Sound Level
DF	Direction Finding
DHS	Department of Homeland Security
EA	Environmental Assessment
EDR	Environmental Data Resources, Inc.
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FCC	Federal Communications Commission
FEMA	Federal Emergency Management Agency
FHBM	Flood Hazard Boundary Map
FIRM	Flood Insurance Rate Map
FPPA	Farmland Protection Policy Act
GSA	General Services Administration
HLS	High Level Site
kHz	Kilohertz
L <sub>p</sub>	Sound Pressure Level
LED	Light-Emitting Diode
LORAN	Long Range Aid to Navigation
MBTA	Migratory Bird Treaty Act
MD	Management Directive
MHz	Megahertz

## Acronyms and Abbreviations

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MOU	Memorandum of Understanding
NAAQS	National Ambient Air Quality Standards
NCA	Noise Control Act
NDRS	National Distress and Response System
NDRSMP	National Distress and Response System Modernization Project
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NO <sub>x</sub>	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O <sub>3</sub>	Ozone
Pb	Lead
PEA	Programmatic Environmental Assessment
PEL	Permissible Exposure Limit
PM <sub>2.5</sub>	Particulate Matter of 2.5 Microns or Less
PM <sub>10</sub>	Particulate Matter of 10 Microns or Less
RCRA	Resource Conservation and Recovery Act
RF	Radio Frequency
RFF	Remote Fixed Facility
SHPO	State Historic Preservation Office(r)
SIP	State Implementation Plan
SO <sub>x</sub>	Sulfur Oxides
SPEA	Supplemental Programmatic Environmental Assessment
SPI COC	South Padre Island Chamber of Commerce
SRCS	Short Range Communication System
TCEQ	Texas Commission on Environmental Quality
THL	Texas Historic Landmark
TPDES	Texas Pollutant Discharge Elimination System
TSPI	Town of South Padre Island
TWDB	Texas Water Development Board
UHF	Ultra High Frequency
USACE	U.S. Army Corps of Engineers
USC	U.S. Code
USCB	U.S. Census Bureau
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service
UTA	University of Texas at Austin
VHF-FM	Very High Frequency-Frequency Modulation
VOC	Volatile Organic Compound



The U.S. Coast Guard (Coast Guard) has identified the need to modernize and replace its antiquated maritime search and rescue communications system in Texas as part of a nationwide mandate. The new equipment will fill existing coverage gaps in very high frequency-frequency modulation (VHF-FM) marine communications used for Coast Guard operational missions, including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security. The new system, known as “Rescue 21,” will be the maritime equivalent of a “911” communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. Rescue 21 represents a quantum leap forward in coastal command and control and distress communications. It will enhance the United States’ homeland security capabilities, as well as other safety and security missions, bringing tremendous benefits to the Coast Guard and the American public.

As part of the Rescue 21 program, the Coast Guard is proposing to construct a remote fixed facility (RFF) to help fill the existing communications gap for the Sector Corpus Christi Area of Responsibility (AOR). An RFF would be built on Coast Guard-owned property at South Padre Island, Cameron County, Texas. The Coast Guard proposes to construct a 400-foot-tall, self-supported, steel lattice communications tower with a direction finding (DF) antenna mounted on top. The addition of a DF antenna and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The proposed tower would be enclosed by a new 75-foot by 75-foot fenced compound. Associated equipment within the compound would include a prefabricated equipment shelter, a 20-kilowatt emergency generator on a concrete slab, and one 500-gallon above ground propane tank.

This Environmental Assessment (EA) has been prepared to describe the Proposed Action and the No Action Alternative; describe the natural, cultural, and socioeconomic resources located in the project area; and evaluate the potential impacts of the alternatives on natural, cultural, and socioeconomic resources. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA; 42 U.S.C. 4321, 4331, 4332), the Council on Environmental Quality regulations implementing NEPA (40 CFR Parts 1500–1508), Department of Homeland Security (DHS) Management Directive (MD) 023-01, *Environmental Planning Program*, and the U.S. Coast Guard’s policy guidelines for implementing NEPA, COMDTINST M16475.1D, *National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts*.

A summary of potential impacts is provided in Table ES-1.

**Table ES-1: Impact Summary**

<b>Resource Area</b>	<b>No Action</b>	<b>Proposed Action</b>
Noise	No impact.	Temporary increase in noise levels would occur during construction activities. Construction would be limited to business hours to minimize impacts. The emergency generator and communications equipment would create intermittent, minor noise impacts.
Air Quality	No impact.	Temporary increase in air emissions would occur during construction activities. Mitigation measures would be implemented to minimize impacts. Occasional use of the emergency generator would result in a negligible increase in long-term emissions.
Geology and Topography	No impact.	No impact.
Soils	No impact.	Temporary disturbance of soils would occur during construction activities. Best management practices (BMPs) would be used to minimize soil loss.
Prime Farmland	No impact.	No impact.
Water Resources	No impact.	Temporary increase in runoff to local surface waters would occur during construction. BMPs would be used to minimize impacts.
Utility Availability	No impact.	Short-term utility increases (electricity and/or water) may be required during construction.
Solid Waste Management	No impact.	No impact.
Drainage	No impact.	Temporary increase in runoff during construction activities. BMPs would be used to minimize impacts.
Transportation and Site Access	No impact.	Minor, temporary increase in volume of traffic during construction activities.
Hazardous Substances	No impact.	Minor amounts of hazardous materials may be generated or used during construction or operation of the tower. All hazardous materials/waste would be handled in accordance with applicable Federal, State, and local regulations.

<b>Resource Area</b>	<b>No Action</b>	<b>Proposed Action</b>
Radio Frequency Radiation	No impact.	The proposed tower would generate radio frequency (RF) radiation; however, the tower would not substantially increase existing RF radiation in the project area and would not exceed permissible exposure limits (PEL).
Wildlife	No impact.	No significant habitat loss or conversion would occur. The proposed tower would present a potential collision risk to migratory birds; however, the tower height would be below the threshold generally thought to pose the greatest risk. The Coast Guard would implement all reasonable measures to avoid affecting migratory birds.
Vegetation	No impact.	Minimal amounts of herbaceous vegetation would be removed.
Threatened and Endangered Species	No impact.	No impacts to protected species are anticipated.
Wetlands	No impact.	A section 404 Nationwide Permit would be required for temporary impacts resulting from trenching approximately 520 square feet (0.01 acre) in wetlands for utility lines. BMPs would be used to minimize soil erosion impacts on wetlands near the project site.
Floodplains	No impact.	Construction would occur within the 100-year floodplain; however, the new tower would not impede movement of floodwaters and the Proposed Action is not expected to have an effect on upstream or downstream floodplains and no adverse impacts to floodplains are anticipated.
Cultural Resources	No impact.	No impact on archaeological resources is anticipated. No significant direct or indirect adverse visual effect is anticipated.
Recreation	The safety of citizens participating in recreational marine activities could be adversely affected if the Coast Guard's communication equipment	The Proposed Action would have a positive impact on marine recreational users by ensuring a more reliable and efficient response by the Coast Guard in emergencies. The tower would be visible from local parks and beaches; however, no significant adverse

<b>Resource Area</b>	<b>No Action</b>	<b>Proposed Action</b>
	for search and rescue activities is not upgraded.	impacts are expected.
Visual Resources	No impact.	Although visible to residents and visitors in the vicinity of the project area, the Proposed Action would not have a significant adverse impact on the viewshed.
Socioeconomic Resources	Not upgrading the Coast Guard's communication equipment could result in adverse effects to recreational boaters and marine businesses due to property losses associated with marine incidents and accidents.	The proposed tower would increase public safety and reduce property losses associated with marine incidents and accidents.
Coastal Zone	No impact.	No impact. The Proposed Action is consistent to the extent practicable with the enforceable policies of the Texas Coastal Management Program.
Coastal Barrier Resources	No impact.	No impact. The project site is not located within the Coastal Barrier Resources System.
Environmental Justice	No impact.	No impact.
Cumulative Effects	The communications gap in the Sector Corpus Christi AOR would not be filled, potentially resulting in property losses and loss of life due to inadequate search and rescue capabilities.	The proposed tower, in combination with existing and future towers on South Padre Island, could result in cumulative impacts to migratory birds. Although the cumulative effects of towers on migratory birds are not well understood, impacts associated with the Proposed Action are not anticipated to be significant because the tower's height would be below the threshold generally thought to pose the greatest risk to migratory birds. Although visible from the historic 1923 Coast Guard Station Port Isabel Building, the proposed tower would not have a significant adverse visual effect on the resource.

## **SECTION ONE      PURPOSE AND NEED FOR ACTION**

### **1.1      SUMMARY OF ENVIRONMENTAL STUDY REQUIREMENTS**

The National Environmental Policy Act of 1969 (NEPA) requires that Federal agencies consider potential environmental consequences of proposed and alternative actions in their decision-making process. NEPA encourages Federal agencies to protect, restore, and enhance the environment through well-informed decisions. The Council on Environmental Quality (CEQ) was established under NEPA for the purpose of implementing and overseeing Federal policies as they relate to this process. The CEQ regulations provide the implementation guidelines for NEPA and require Federal agencies to develop agency-specific NEPA guidelines.

This site-specific Environmental Assessment (EA) has been prepared to describe the Proposed Action and a range of reasonable alternatives, including the No Action Alternative. The No Action Alternative provides a baseline for comparing the Proposed Action with existing conditions. This EA has been prepared in accordance with NEPA, the CEQ regulations implementing NEPA (Title 40 Code of Federal Regulations [CFR] Parts 1500 through 1508), and the U.S. Coast Guard's policy guidelines for implementing NEPA, Department of Homeland Security (DHS) Management Directive (MD) 023-01, *Environmental Planning Program*, and COMDTINST M16475.1D *National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts*.

### **1.2      BACKGROUND**

The U.S. Coast Guard (Coast Guard) is required by Federal statutes to carry and maintain communication via very high frequency-frequency modulation (VHF-FM) radio, establishing it as the standard means for maritime communication. Other Federal statutes task the Coast Guard with additional responsibilities, such as operating facilities for the promotion of search and rescue operations, enforcing Federal laws and statutes, and assisting Federal and State agencies in protecting the coastlines.

The National Distress and Response System (NDRS), the Coast Guard's current short-range VHF-FM radio system, forms the backbone of the Coast Guard's Short Range Communication System (SRCS). Established during the 1970s, the NDRS is a VHF-FM-based radio communication system that provides two-way voice communication with commercial and recreational traffic in coastal areas and in navigable inland waterways. It consists of approximately 300 remotely controlled VHF-FM transmit/receive high-level sites (HLS) located throughout the continental United States (including the Great Lakes and all major inland bays and waterways), Alaska, Hawaii, the Caribbean, and Guam. The NDRS' primary mission is to provide the Coast Guard with a means to monitor the domestic and international VHF-FM distress frequency and to coordinate search and rescue response operations. Its secondary mission is to provide command and control communications for virtually all Coast Guard missions.

While this system has served the Coast Guard well over the years, it consists of out-of-date and non-standard equipment that has many limitations. The current NDRS does not provide the Coast Guard with a reliable means of meeting its multi-mission requirements, including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security. Nationwide, NDRS operational deficiencies include:

- Obsolete/non-standard equipment
- Inadequate transmission security
- Numerous geographic coverage gaps
- Imprecise position-locating capability
- Inadequate channel capacity
- Limited data capability
- Inadequate communications with public safety and other emergency response service agencies
- Poor caller verification assistance and recording capability
- No digital selective calling capacity
- No interface with the rest of the Coast Guard's telecommunications system

In July of 1998, the Coast Guard prepared a Programmatic Environmental Assessment (PEA) to evaluate the potential environmental impacts of the proposed National Distress and Response System Modernization Project (NDRSMP), a proposed Federal project subject to the NEPA review process (USCG, 1998). Four technology modernization alternatives were selected for analysis: 1) No Action; 2) Rehabilitated or Upgraded System; 3) Dual Mode VHF and/or Ultra High Frequency (UHF) Network; and 4) Multi-Mission Satellite, Cellular, VHF Network. The 1998 PEA evaluated the potential impacts of each alternative on the following environmental resource areas: geology and soils, hydrology and water quality, biological resources, land use, visual resources, hazardous materials and wastes, air quality, cultural resources, noise, transportation and circulation, socioeconomics, and radio waves.

In September of 2002, the Coast Guard prepared a Supplemental PEA (SPEA) because a substantial amount of time had passed since the 1998 PEA was published. In the 2002 SPEA, the Coast Guard considered four alternatives to deploy the NDRSMP: 1) No Action; 2) Deploying New Communications Technology to an Existing Antenna Tower Site that Supports the NDRS; 3) Deploying New Communications Technology to a Leased Commercial Tower Site; and 4) Deploying New Communications Technology to a New Undeveloped Site. The 2002 SPEA updated the potential effects of each of the new alternatives on each of the environmental resource areas that were addressed in the 1998 PEA, and assessed the potential effects to environmental resource areas that were not originally assessed in the 1998 PEA. The 2002 SPEA identified, described, and evaluated the potential environmental impacts that could result from implementation of the NDRSMP, and took into consideration cumulative impacts from other actions (USCG, 2002a). The 1998 PEA and 2002 SPEA are the first level of documents upon which subsequent NEPA analysis and documentation, including this EA, are tiered for individual actions and their site-specific impacts.

### **1.3 PURPOSE AND NEED FOR ACTION**

As part of a nationwide initiative, the Coast Guard has identified the need to modernize and replace its antiquated maritime distress and response communications system in Texas. The coverage gaps that exist in the current VHF-FM marine communications system present limitations to the Coast Guard's effectiveness in monitoring distress calls and other operational

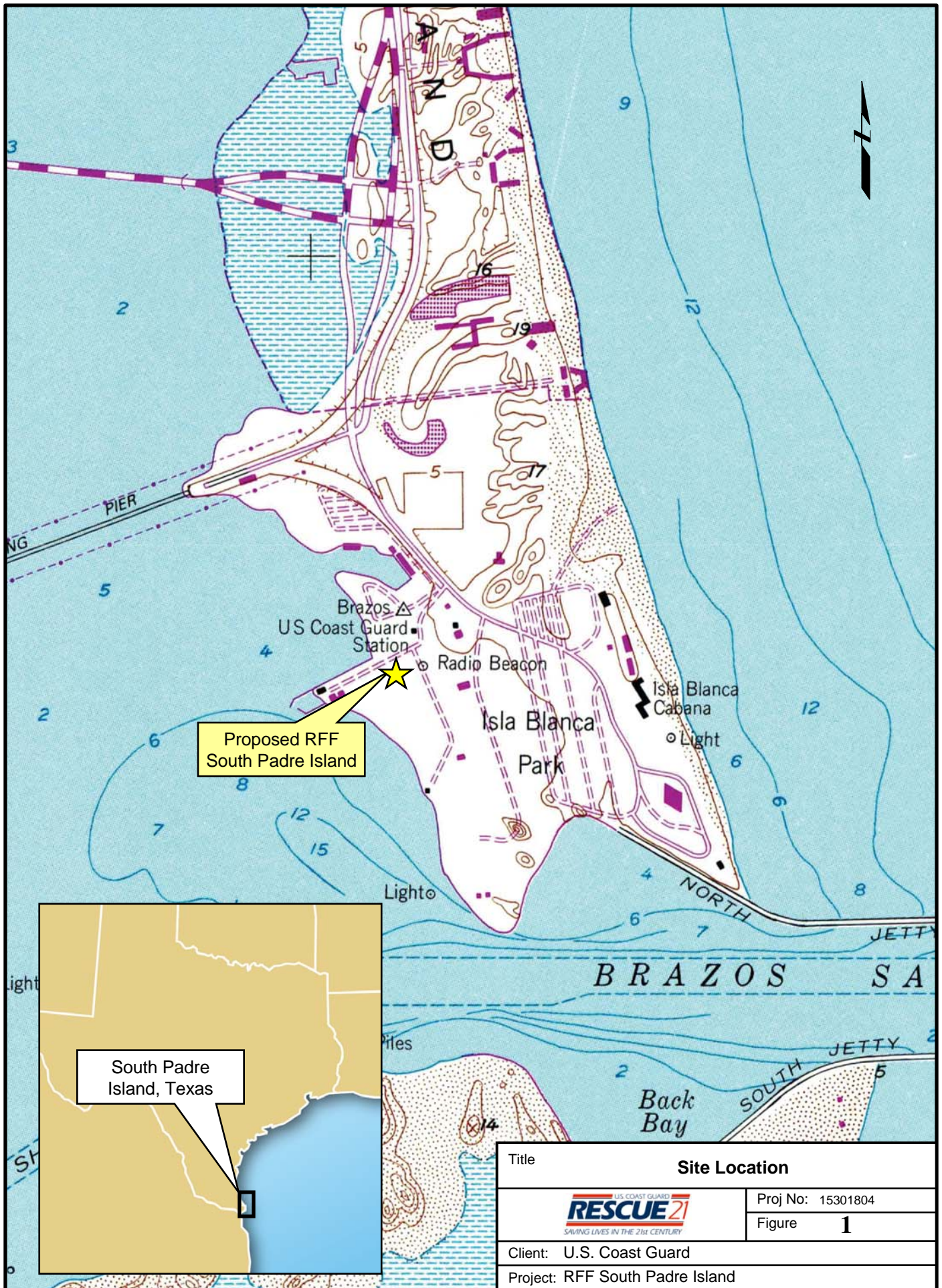
missions, including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security. To address the limitations of the current communications system, the Coast Guard has implemented a new technologically advanced communications system that is more robust, more reliable, and more capable, and will revolutionize how the Coast Guard communicates and carries out its various missions.

The new system, known as “Rescue 21,” will be the maritime equivalent of a “911” communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. Rescue 21 represents a quantum leap forward in coastal command and control and distress communications, and will replace a wide range of aging, obsolete VHF-FM radio communications equipment. The U.S. Coast Guard’s current NDRS does not provide the Coast Guard with a reliable means of meeting its multi-mission requirements. Rescue 21 will provide the Coast Guard with a state-of-the-art maritime distress and response communications system and will enhance the United States’ homeland security capabilities, as well as other safety and security missions, bringing tremendous benefits to the Coast Guard and the American public. As of April 2009, the Coast Guard has provided Rescue 21 communications along 28,016 miles of U.S. coastal waters.

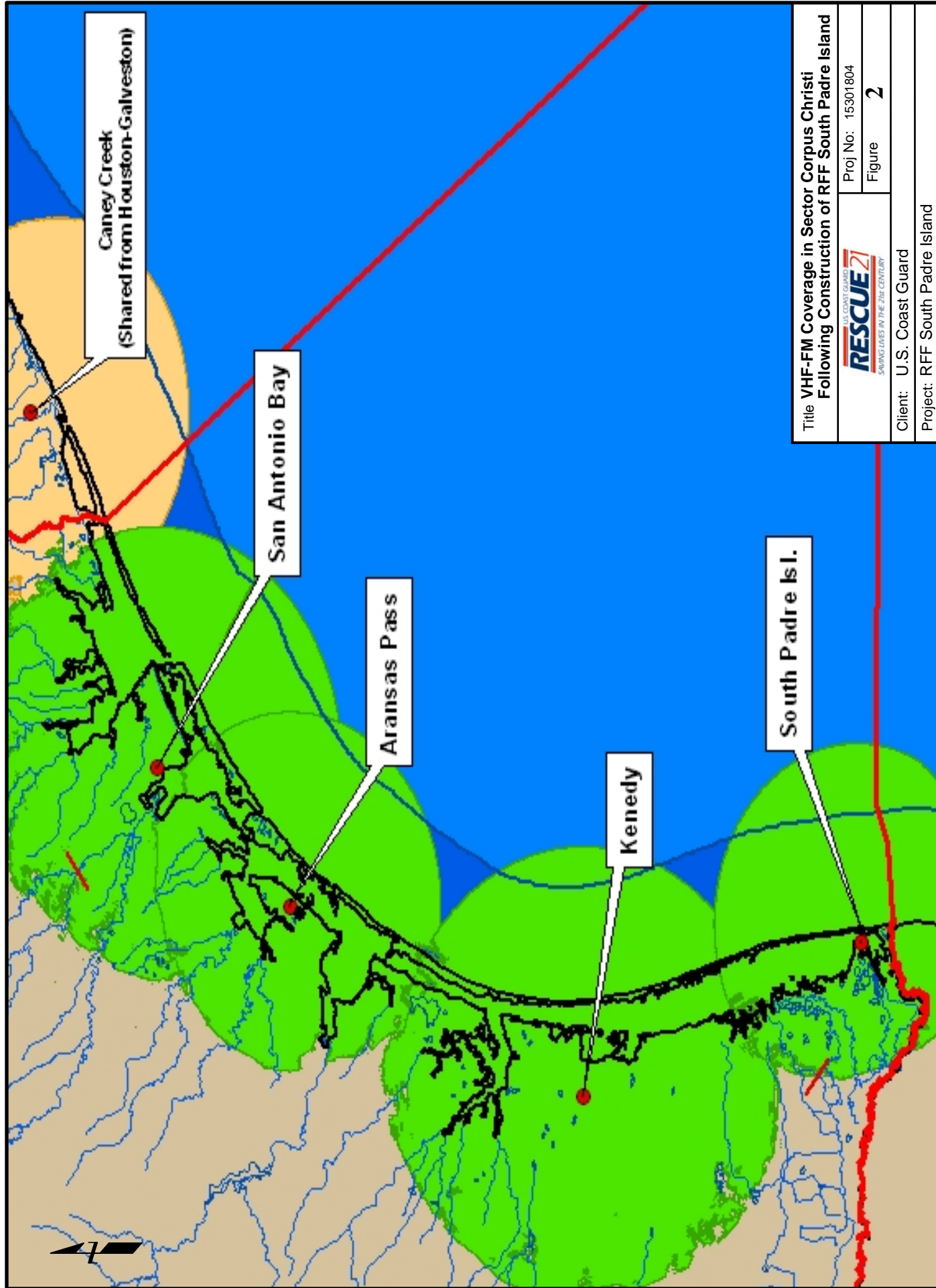
The purpose and need for the proposed project is to provide optimum Radio Frequency (RF) coverage of the Sector Corpus Christi Area of Responsibility (AOR), which extends 300 miles along the Texas coastline from the east bank of the Colorado River in Matagorda County to the United States-Mexico border at the Rio Grande River. The Proposed Action involves constructing a Remote Fixed Facility (RFF) to fill the existing communications gap for the Sector Corpus Christi AOR. The RFF would be built approximately 130 feet northeast of the gated entry to Coast Guard Station South Padre Island located at 1 Wallace Reed Road, at the south end of South Padre Island, Texas, in Cameron County (Figure 1). The proposed site is bordered by Wallace Reed Road to the north, an access road to the east, and Coast Guard-owned fences to the west and south.


The Proposed Action would serve as a final component to complete communications coverage and reduce several existing communication gaps in the current system’s coverage in the Sector Corpus Christi AOR. The implementation of the Proposed Action in addition to the installation of three other RFF sites to the north (RFF Kenedy, RFF Aransas Pass, and RFF San Antonio Bay) would provide optimum coverage within the Coast Guard’s Sector Corpus Christi AOR (Figure 2).









Title VHF-FM Coverage in Sector Corpus Christi Following Construction of RFF South Padre Island	
	Proj No: 15301804
Client: U.S. Coast Guard	Figure 2
Project: RFF South Padre Island	

## **1.4 PUBLIC PARTICIPATION**

In June 2009, as part of the NEPA compliance process for the construction of RFF South Padre Island, the Coast Guard sent initial coordination letters to the agencies listed in Section 5 (Appendix I).

The Draft EA was available for public review and comment between July 28, 2009 and August 28, 2009 at the Port Isabel Public Library. A Public Notice advertising the availability of the draft EA for public review and comment was published in two local newspapers; the Brownsville Herald and the Valley Morning Star.

To date, the Coast Guard has received responses from the following agencies:

- Planning and Zoning Commission, Town of South Padre Island, Texas
- South Padre Island Police Department
- Texas Historical Commission
- Texas Parks & Wildlife, Wildlife Habitat Assessment Program, Wildlife Division
- The University of Texas at Brownsville and Texas Southmost College
- Town of South Padre Island, Texas
- U.S. Department of Agriculture, Natural Resource Conservation Service
- U.S. Department of Interior, U.S. Fish and Wildlife Service
- U.S. Environmental Protection Agency

All responses received are included in Appendix I and are addressed in this Final EA.

The Final EA will be available on June 16, 2011. A Public Notice advertising the availability of the Final EA was published in the same two local newspapers on June 16, 2011. The Public Notice also served as the Coast Guard's notice of compliance with Executive Order (EO) 11988 (Floodplain Management), the Coastal Zone Management Act (CZMA) of 1972, and Section 106 of the National Historic Preservation Act (NHPA) of 1966. A copy of the draft EA was provided to the agencies listed in Section 5. In preparing the 2002 SPEA, the Coast Guard coordinated with an extensive list of government and local agencies nationwide; these agencies are also listed in Section 5.

### SECTION TWO      DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

#### 2.1      ALTERNATIVES

##### 2.1.1      Siting Process

Towers supporting the Rescue 21 project are placed to provide clear and effective radio communications to serve the Coast Guard's operational missions. For Coast Guard operational regions in coastal areas, the communication coverage area extends seaward at least 20 nautical miles from the territorial sea baseline, as defined in Federal regulations (33 CFR 2.5–2.22). The transmission patterns are circular, resulting in potential coverage gaps between adjacent towers; overlap of coverage areas is required to support reliable radio reception and identify the direction of received signals, such as those for search and rescue calls. These requirements along with the regional topography dictate the tower's general location and minimum height. Meeting these initial operational requirements is the first step in the siting process.

Once initial operational requirements are determined, the Coast Guard then searches the Federal Communications Commission (FCC) tower database to identify all registered towers that could possibly support the Rescue 21 equipment. First, existing towers are considered as co-location sites to save time and money, and to avoid potential environmental consequences that would result from constructing a new or replacement tower. The Coast Guard screens these existing towers for technical requirements, such as height compatibility with established Coast Guard frequencies. Existing towers that meet the initial screening requirements are then evaluated by the Coast Guard for the following additional requirements:

- Structural integrity and potential for overload if Coast Guard equipment is installed
- Frequency interference that cannot be filtered effectively at the height required to install Coast Guard equipment (each filter reduces the range of the Rescue 21 equipment)
- Space on the existing tower at the height required to install the Rescue 21 equipment
- Willingness of the existing tower owner to lease tower space to the Coast Guard

If no existing towers are available or suitable for supporting the Rescue 21 equipment, the Coast Guard begins to look for open land within the area where an RFF is required based on operational requirements. The Coast Guard's priority for selecting land for the construction of a new tower is a function of the cost to build and maintain the tower over its lifetime and the difficulty of implementation. The Coast Guard uses the following order of priorities for site selection: 1) Coast Guard-controlled land; 2) land controlled by another Federal agency; 3) lease of non-federally owned land; and 4) acquisition of new land.

In the case of RFF South Padre Island, the Coast Guard would construct a communications tower on Coast Guard-owned land. The property is within the grounds of USCG Station South Padre Island and is adjacent to the 1923 USCG Station Port Isabel Building. The Coast Guard has historically used this property for several Long Range Aid to Navigation (LORAN) beacon towers, known as LORAN Station Port Isabel (STA "T" 2L6 and STA "P" 3H3) constructed in 1945 and 1968, and more recently as a NDRS communications site. The NDRS HLS Port Isabel antennas were attached to a 305-foot-tall, painted guyed tower. The HLS tower was removed in

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## Description of the Proposed Action and Alternatives

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March 2005 when the NDRS equipment was temporarily relocated to a commercial tower in Port Isabel.

The combination of the proposed tower location and height would provide continuous coverage for the required 20-nautical mile area, thus meeting the stated purpose and need. Other potential tower locations were considered but dismissed because they did not meet operational requirements or had technical flaws (see Section 2.2, Alternatives Considered and Dismissed).

### 2.1.2 No Action Alternative

Under the No Action Alternative, a new communications tower would not be constructed at Coast Guard Station South Padre Island, resulting in a VHF-FM communications coverage gap within the Sector Corpus Christi AOR when the existing legacy NDRS is discontinued.

### 2.1.3 Proposed Action – Construction of RFF South Padre Island

The Coast Guard proposes to construct a 400-foot-tall communications tower (413 feet when including the direction-finding antenna and lightning rod) as part of the Rescue 21 program on Coast Guard-owned property at Station South Padre Island and is adjacent to the 1923 USCG Station Port Isabel Building. No structures are currently on site. The topography is flat and the ground is mainly sandy soil with minimal vegetation.

The Proposed Action would include construction of a 400-foot-tall, self-supported lattice communications tower within a 75-foot by 75-foot fenced compound (Figures 3 and 4).

The USCG is considering two options to meet Federal Aviation Administration (FAA) standards as described in the FAA Advisory Circular AC70/7460-1K, Change 2, *Obstruction Marking and Lighting*:

- *Option 1:* A 400-foot-tall tower painted with equal-width alternating bands of aviation orange and white according to FAA standards. This option would not require daytime white strobe lighting. For nighttime lighting, two L-864 red flashing (2,000 candela) beacons would be mounted at the 400-foot level and three at approximately the 200-foot level. The L-864 lights flash synchronously at a rate of 20 times per minute in 1.5-second on/off intervals. Three L-810 steady burning (32.5 candela) red obstruction lights would be mounted at both the 100-foot and 300-foot levels. Light-emitting diode (LED) light fixtures would be used in lieu of incandescent bulbs because they require less maintenance and less energy to operate. The lights turn on and off automatically and operate only during the nighttime.
- *Option 2:* A 400-foot-tall unpainted tower (the tower would remain a steel grey color) that would require daytime medium intensity (20,000 candelas) white strobe lighting in accordance with FAA standards for dual lighting (FAA Style E). Nighttime lighting would be the same in appearance, flash rate, and intensity as described for Option 1. The daytime white strobes (L-865) would flash 40 times per minute and would be mounted at the same elevations and in the same number as the nighttime red L-864 beacons in a combined dual red/white LED fixture.

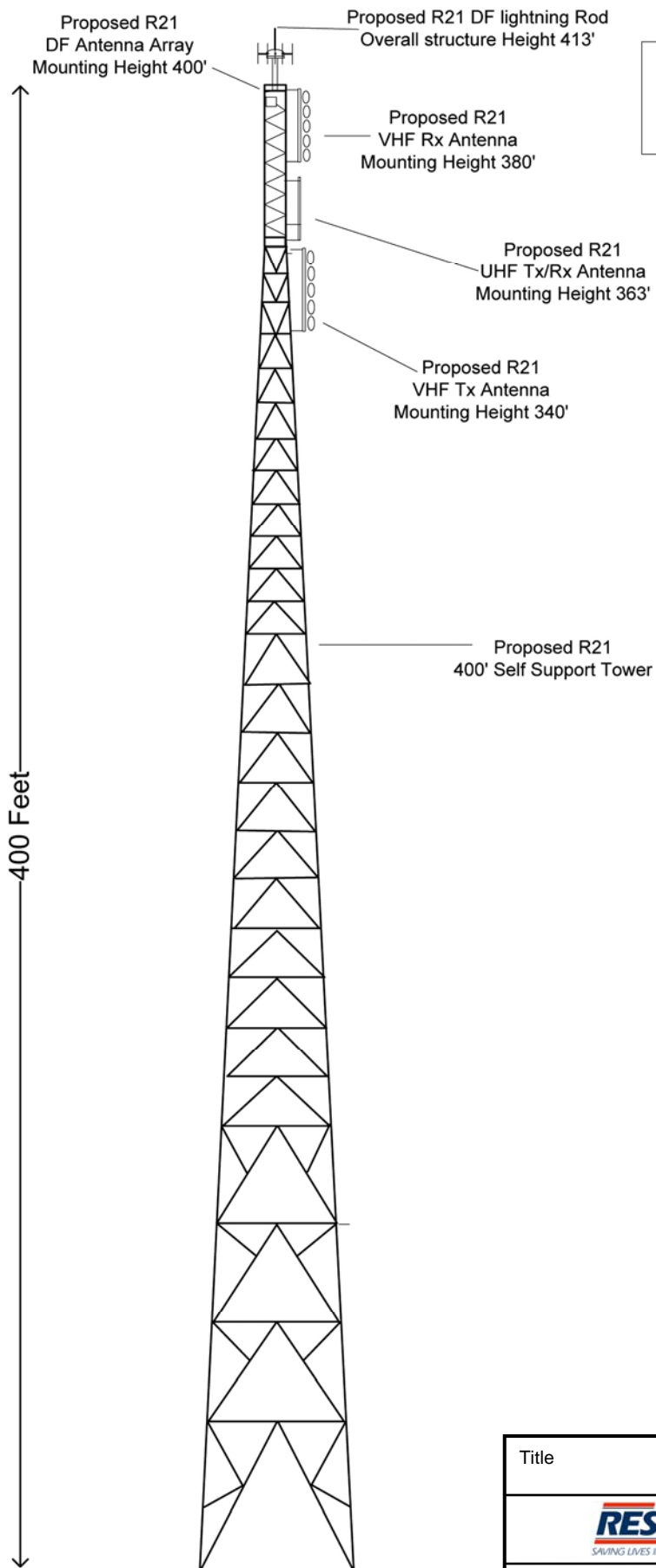
For both options, the compound would include a 12-foot by 28-foot elevated steel platform containing an equipment shelter, an emergency back-up generator, a 500-gallon propane fuel tank installed on the slab at grade, and a 2-foot by 4-foot-long ice bridge (designed to support the

## **Description of the Proposed Action and Alternatives**

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transmission lines from the tower to the cable entry port). Short electrical and telecommunication trenches would be excavated to connect to existing nearby local utility services. The 75-foot-wide by 75-foot-long compound would be surrounded by an 8-foot-tall chain link fence topped with three-strand barbed wire. The compound would be paved with crushed limestone. Equipment would be staged on existing paved surfaces or sparsely vegetated areas adjacent to the proposed compound site.

The combination of the proposed tower location and the 400-foot height would provide improved communications coverage for the Sector Corpus Christi AOR, thus meeting the purpose and need for the Proposed Action.



## RFF South Padre Island CP-102

Title

### Tower Elevation

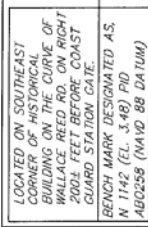


Proj No: 15301804

Figure **3**

Client: U.S. Coast Guard

Project: RFF South Padre Island



## Site Plan

Figure 4

Project: RFF South Padre Island

### 2.2 ALTERNATIVES CONSIDERED AND DISMISSED

The Coast Guard's site selection methodology includes comprehensive analyses of existing RFFs and potential candidate sites. The site selection process is focused on identifying and developing candidate sites that can achieve technical requirements with affordable costs, appropriate schedule, and minimal implementation risk. The following alternatives were considered and dismissed for Coast Guard Rescue 21 equipment within the Sector Corpus Christi AOR.

#### 2.2.1 Construction of a 400-Foot-Tall Guyed Tower at Station South Padre Island

A 400-foot-tall guyed tower would need a guy wire radius of approximately 340 feet, and would require removal of an existing helicopter landing pad on Station property. This alternative is, therefore, not a viable alternative due to operational requirements for continued use of the helicopter landing pad at the Coast Guard Station for emergency purposes.

#### 2.2.2 Construction of New Tower on Property Not Controlled by Coast Guard

The U.S. General Services Administration (GSA) real property policy, which applies to all government agencies, requires that Federal agencies "achieve maximum use of their real property, in terms of economy and efficiency" and satisfy their real property needs by first seeking affordable property held by other entities within the same agency (i.e., other Coast Guard or U.S. Department of Homeland Security entities), and then other Federal agencies, rather than acquiring such property from a non-Federal entity, unless mission requirements dictate otherwise (41 CFR 102-73.10, 102-73.250[a], and 102-75.25[a]). In addition, the Sector Corpus Christi AOR covers the coastline of what can be characterized as expensive real estate, and thereby raises some significant obstacles to implementing a cost-effective solution. Purchasing property for construction of a new tower in this area is not expected to be feasible. Any land acquired would be expensive due to the tourism- and resort-based nature of the region. For these reasons, purchasing property for construction of a new tower was dismissed from consideration.

#### 2.2.3 Co-location on Existing Commercial Tower

No existing towers within a 20-mile radius of Coast Guard Station South Padre Island met the structural or height requirements for the Rescue 21 antennae installations (Figure 5). Seven existing commercial towers were considered within a 15-mile radius to the west of Station South Padre Island. The majority of those towers were either too short, did not have sufficient available space to mount Rescue 21 antennas, or were located too far inland to meet coverage requirements. A leasing agreement for tower space could not be reached with the owner of one of the commercial towers. Two tall condominium buildings on South Padre Island were also examined as potential platforms for equipment installations. Due to structural problems, the construction of the 32-story Ocean Tower building had been suspended. The twin tower design of the 31-story Sapphire Condominium building would have created antenna separation and equipment installation/design problems. An additional five commercial towers were investigated within a 20-mile radius to the west and southwest of the City of Harlingen, Texas, which is located approximately 30 miles west of South Padre Island. All of these towers were found to be too far inland to meet Rescue 21 coverage requirements. Table 2-1 provides a summary of the existing towers that were considered and the reason(s) they were dismissed.



## Description of the Proposed Action and Alternatives

**Table 2-1: Existing Towers and Sites Considered for Co-location**

ASR No. <sup>1</sup>	Latitude North	Longitude West	Street Address	Town	FCC listed Owner	Tower design	Tower Height. AGL <sup>2</sup> w/o appurten.	Height AGL with top appurten.	Reason Tower Was Not Suitable
<b>Towers studied within a 15 mile radius of Coast Guard Station South Padre Island, TX</b>									
1001880	25-58-55.3	97-20-13.9	45.72 mi S SR 48 NE Bro Fishing Harbor	Brownsville	STC Five LLC	self-support	251 ft <sup>3</sup>	251 ft	Tower is too short to meet Rescue 21 coverage requirements
1036944	26-03-48.3	97-12-53.9	0.45 mi W of Hwy 2520, 1.5 mi S of Hwy 2520 & US-83	Port Isabel	WWC Texas RSA Limited Partnership	self-support	120 ft	136 ft	Tower is too short to meet Rescue 21 coverage requirements
1214417	26-07-46.3	97-21-13.3	San Jose Ranch Rd (Laguna Vista #35799)	Port Isabel	American Towers, Inc.	guyed	190 ft	192 ft	Tower is too far inland and too short to meet coverage requirements
1224555	26-03-56.1	97-23-52.9	38922 State Hwy 100 (Los Fresnos #310044)	Los Fresnos	American Towers, Inc.	self-support	244 ft	253 ft	Tower is too far inland (15 miles) to meet coverage requirements
1238340	26-03-15.3	97-12-47.7	2001 Port Rd.	Port Isabel	O.E. Investments, Inc.	guyed	480 ft	480 ft	Could not reach agreement with tower owner on lease price
1055005	25-57-49.0	97-14-32.0	State Hwy 14, 1.4 mi W	Loma De Los Ebantos	Coast Broadcast	guyed	359 ft	359 ft	The tower would not meet coverage objectives and does not have available space
1206826	26-04-05.2	97-13-16.9	0.23 mi SW of Intersection of Port Rd & Hwy 100	Port Isabel	Alternative Broadcasting	self-support	346 ft	346 ft	The tower would not meet coverage objectives and does not have available space; tower planned but not constructed

## Description of the Proposed Action and Alternatives

ASR No. <sup>1</sup>	Latitude North	Longitude West	Street Address	Town	FCC listed Owner	Tower design	Tower Height. AGL <sup>2</sup> w/o appurten.	Height AGL with top appurten.	Reason Tower Was Not Suitable
NA	26-08-47	97-10-16	Ocean Tower SPI Padre Blvd	S. Padre Is.	Ocean Towers, L.P.	32 story building	391 ft	391 ft	Major structural problems with building foundation; building construction suspended
NA	26-04-58	97-09-40	Sapphire Condos 310 Padre Blvd	S. Padre Is.	Randall Davis Co.	31 story building	380 ft	380 ft	Twin tower building configuration creates antenna separation and equipment installation/design problems
<b>Towers considered beyond a 15-mile radius of Coast Guard Station South Padre Island, TX</b>									
1047398	26-13-01.0	97-46-49.0	1.5 mi WSW of intersection of Wilson Tract & Primera Rd	Primera	Community Educational TV Inc.	guyed	1000 ft	1000 ft	Tower is located too far inland to meet coverage objectives
1048835	26-08-57.0	97-49-19.0	on Dukes Hwy	La Feria	Tall Towers Company	guyed	1338 ft	1338 ft	Tower is located too far inland to meet coverage objectives
1046272	26-07-15.0	97-49-19.0	2 mi south	La Feria	RGV Educational Broadcasting, Inc.	guyed	1244 ft	1244 ft	Tower is located too far inland to meet coverage objectives
1047170	26-06-10.1	97-51-25.1	Off Farm Rd. 2556 (La Feria #90317)	Harlingen	American Towers, Inc.	guyed	1000 ft	1005 ft	Tower is located too far inland to meet coverage objectives
1046017	26-04-53.0	97-49-42.0	0.6 mi N of US Hwy 281	Santa Maria	World Radio Network, Inc.	guyed	1184 ft	1184 ft	Tower is located too far inland to meet coverage objectives

<sup>1</sup>ASR No. is the number assigned to the antennae by the FCC Antennae Registration System, <sup>2</sup>AGL is above ground level, <sup>3</sup>ft = feet





### SECTION THREE      AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

#### 3.1      INTRODUCTION

This section presents the existing environment or baseline conditions at the project site for the biophysical resources that would potentially be affected by the No Action Alternative and the Proposed Action. Information for this section was derived from a review of relevant literature and websites, as well as a site visit conducted on April 7, 2009.

This section is organized by individual resource and includes descriptions of both the biological and physical portions of the potentially affected resource. Within this section, environmental consequences are presented for each alternative. Unless noted in the text, impacts from either the painted or unpainted tower option are considered to be the same.

#### 3.2      NOISE

##### *Affected Environment*

Noise is generally defined as unwanted sound and can include any sound that is undesirable because it interferes with communication, is intense enough to damage hearing, or is otherwise annoying. Responses to noise by living organisms vary depending on the type and characteristics of the noise, distance between the noise source and receptor, receptor sensitivity, and time of day.

Sound pressure level ( $L_p$ ) can vary over an extremely large range of amplitudes. The decibel (dB) is the accepted standard unit for measuring the amplitude of sound because it accounts for the large variations in amplitude and reflects the way people perceive changes in sound amplitude. Sound levels are easily measured, but the variability is subjective and physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation by subjective terms, such as “loudness” or “noisiness.”

Different sounds have different frequency contents. When describing sound and its effect on a human population, A-weighted sound levels (dBA) are typically used to account for the response of the human ear. The term “A-weighted” refers to a filtering of the noise signal, which emphasizes frequencies in the middle of the audible spectrum and de-emphasizes low and high frequencies in a manner corresponding to the way the human ear perceives sound. The dBA has been found to correlate well with people’s judgments of the noisiness of different sounds and has been used for many years as a measure of community noise.

Noise is federally regulated by the Noise Control Act of 1972 (NCA). Although the NCA gives the Environmental Protection Agency (EPA) authority to prepare guidelines for acceptable ambient noise levels, it only directs those Federal agencies that operate noise-producing facilities or equipment to implement noise standards. EPA guidelines, and those of many other Federal agencies, state that outdoor noise levels in excess of 55 dBA are “normally unacceptable” for noise-sensitive land uses such as residences, schools, or hospitals.

Loud, disturbing, and unnecessary noise at the project site would be regulated by the Code of the Town of South Padre Island, Chapter 12-2 (TSPI, 2009a). Although the project site lies outside of the municipal town limits, it does lie within the extraterritorial jurisdiction of the Town of

## Affected Environment and Environmental Consequences

South Padre Island. Construction-related noise in the project area would be limited to daytime hours (from 7:00 a.m. to 8:00 p.m.), or any time that the sound level does not exceed 80 dBA at or across a real property boundary. The State of Texas does not regulate noise.

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, there would be no new construction or operations, and therefore, no impact on ambient noise levels in the project area.

#### Proposed Action

Under the Proposed Action, noise would be emitted from mechanical equipment used in the construction of the communication tower. Table 3-1 shows the anticipated noise levels at a distance of about 50 feet from miscellaneous heavy equipment at the project site. The use of heavy equipment would be a short-term, temporary activity only associated with the initial construction phase of the proposed project. The impact of noise would be greatest within 0 to 50 feet of the site. Noise levels decrease with distance, and the impact would therefore be attenuated as distance from the site increased. To minimize noise impacts, construction activities would comply with South Padre Island's noise regulation and would be limited to normal business hours.

**Table 3-1: Heavy Equipment Noise Levels at 50 Feet**

Equipment Type <sup>a</sup>	Number Used <sup>a</sup>	Generated Noise Levels L <sub>p</sub> (dBA) <sup>b</sup>
Scraper	1	89
Bulldozer	1	88
Trenching Machine	1	85
Backhoe (rubber tire)	1	80
Front Loader (rubber tire)	1	80
Concrete Finisher	1	80
Dump Truck	1	75
Concrete Truck	1	75
Crane	1	75
Flat-Bed Truck (18 wheel)	1	75
<sup>a</sup> Estimated		
<sup>b</sup> Source: CERL, 1978		

Other sources of noise associated with the operation of RFF South Padre Island would be the generator used for emergency backup power and the continuous, low-volume hum of the communications equipment. The generator would run for short periods of time on a regular basis for routine maintenance checks, and would automatically start during power outages. The Coast Guard estimates that the generator would run up to 12 hours per year. Based on the intermittent use of the generator, no significant noise impacts are anticipated. Noise impacts resulting from the long-term operation and maintenance of the communication tower are not expected to be

significant. No adverse impacts to the existing noise levels within the project area are anticipated.

### 3.3 AIR QUALITY

#### *Affected Environment*

##### Air Pollutants and Regulations

Under the provisions of the Clean Air Act (CAA), as amended, the EPA has established National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. Federal NAAQS are currently established for the following six “criteria” pollutants: carbon monoxide (CO), ozone (O<sub>3</sub>), lead (Pb), nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), and particulate matter equal to or less than 10 microns (PM<sub>10</sub>) and 2.5 microns (PM<sub>2.5</sub>). The CAA established two types of air quality standards. Primary standards establish pollutant limits to protect public health, including the health of sensitive populations, such as children, the elderly, and asthmatics. Secondary standards establish pollutant limits to protect public welfare, including protection against decreased visibility and damage to wildlife, crops, vegetation, and buildings.

The EPA classifies the air quality within an air quality control region (AQCR) according to whether the region meets or exceeds Federal primary and secondary NAAQS. Federal projects that occur in regions not meeting primary or secondary standards must be evaluated to determine if a CAA conformity analysis is required in accordance with 40 CFR 93.

##### Regional Air Quality Considerations

Key factors affecting air quality conditions for a location or region are pollutant emission rates, emission parameters, topographic features, chemical reactions, cumulative effects from other emission sources, and meteorological conditions (e.g., temperature, winds, and precipitation).

An AQCR or portion of an AQCR may be classified as attainment, non-attainment, or unclassified for each of the six criteria pollutants. Attainment describes a condition in which one or more of the six NAAQS are being met in an area. The area is considered to be in attainment only for those criteria pollutants for which the NAAQS are being met. Non-attainment describes a condition in which one or more of the six NAAQS are not being met in an area. Unclassified indicates that air quality in the area cannot be classified and is, therefore, treated as attainment. An area may have all three classifications for different criteria pollutants.

For non-attainment areas, a State must submit to the EPA a detailed State Implementation Plan (SIP), a federally approved and enforceable plan by which the State identifies how it will attain and/or maintain NAAQS. From time to time a State may choose to revise its SIP or EPA may require a State to revise its SIP. Air emission regulations are more stringent in non-attainment areas.

Cameron County is in an attainment area for all criteria pollutants (TCEQ, 2009).

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, no new construction or operations would occur and there would be no increase in long-term or short-term air emissions.

#### Proposed Action

The Proposed Action would result in short-term air emissions during construction activities, principally from construction activities related to site preparation and the use of construction equipment. The Proposed Action would result in a negligible amount of long-term emissions from occasional use of the emergency generator.

A majority of the emissions from the Proposed Action would occur as a direct result of construction activities. Site clearing and preparation activities are a potential source of fugitive dust emissions that may have a temporary impact on local air quality in the immediate project vicinity. If necessary, the construction contractor would water down disturbed areas of the construction site to reduce the impact of fugitive dust emissions. The effects of fugitive dust would be limited to the immediate project vicinity, would last only as long as the duration of construction, and would not result in long-term impacts.

Emissions from fuel-burning combustion engines (e.g., heavy equipment, earthmoving machinery, and motor vehicles) could temporarily increase the levels of some criteria pollutants, including CO, NO<sub>x</sub>, and PM, as well as some non-criteria pollutants such as volatile organic compounds (VOCs). To minimize the potential for these impacts, engines would be properly maintained, and fuel-burning equipment running times would be kept to a minimum. The effects of fuel-burning combustion engines would be limited to the immediate project vicinity, last only as long as the duration of construction, and would not result in long-term impacts.

A final potential source of increased emissions would be the emergency generator that would run during power outages and routine maintenance checks. The Coast Guard estimates the generator would operate for up to 12 hours per year. Potential emissions from the generator within the immediate project vicinity include CO, SO<sub>x</sub>, NO<sub>x</sub>, PM<sub>10</sub>, and VOCs. Based on the intermittent usage and fuel type, an air permit from the Texas Commission on Environmental Quality (TCEQ) would not be required for the generator. No significant short- or long-term impacts are expected from use of the emergency generator.

In compliance with 40 CFR 93, the Proposed Action has been evaluated to address the potential need for preparation of an air quality conformity analysis. Under the CAA, a general conformity analysis is required if a federally proposed action is to take place in an existing non-attainment area and if the increase in air emissions for each pollutant exceeds the outlined limits. Because the Proposed Action site lies within an attainment area for all criteria pollutants, a CAA conformity analysis is not required.



### 3.4 EARTH RESOURCES

#### 3.4.1 Geology and Topography

##### ***Affected Environment***

The project site is located within the Coastal Prairies section of the Gulf Coastal Plain physiographic province (UTA, 1996). South Padre Island is underlain by nearly flat Holocene (recent) age bedrock strata composed of deltaic muds and sands. The topography at the project site is level and the project site is located 5 feet above mean sea level (amsl) (EDR, 2009).

##### ***Environmental Consequences***

###### No Action

Under the No Action Alternative, no physical changes to the project site would occur and there would be no impacts to the geology or topography of the area.

###### Proposed Action

Under the Proposed Action, no significant adverse impacts to geology or topography at the project site are anticipated. Bedrock is not anticipated to be encountered during construction activities. Grading for the preparation of the tower compound would not have a noticeable effect on the project site's existing level topography. The Proposed Action is not anticipated to have any adverse or long-term impacts to geology and topography.

#### 3.4.2 Soils

##### ***Affected Environment***

According to U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) data, soils within the project site are mapped within the Ustifluvents soil unit (NRCS, 2009). The project site is characterized by clayey, somewhat poorly drained soils with slow infiltration rates. Available water capacity is high, and runoff is moderate. Soil erosion potential is low.

The Coast Guard sent a letter to the NRCS in June 2009 to obtain information on any regulatory requirements under its jurisdiction for the proposed RFF South Padre Island construction (Appendix I). The Coast Guard received a response from the NRCS dated June 30, 2009 (Appendix I) stating the project should have no significant adverse impact on the environment or natural resources in the area and that NRCS does not require any permits, easements, or approvals for those activities.

##### ***Environmental Consequences***

###### No Action

Under the No Action Alternative, no physical changes to the project site would occur and there would be no impacts to soils.

###### Proposed Action

Under the Proposed Action, no significant adverse impacts to soils are anticipated. Temporary disturbance to surficial soils would occur during the construction of the tower compound. To

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## **Affected Environment and Environmental Consequences**

reduce the potential adverse impacts associated with soil disturbance, best management practices (BMPs), such as minimizing the removal of existing vegetation, mulching bare soils after construction is completed, and the use of sediment barriers such as silt fence, would be used to prevent the erosion of soils and transport of sediment from the project site. Grading and excavation of soils within the project site would be minimized to the greatest extent possible.

### **3.4.3 Prime Farmland**

#### ***Affected Environment***

Prime farmland is defined as land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimal inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion. Unique farmland is defined as land other than prime farmland that is used for the production of specific high-value food and fiber crops such as citrus, tree nuts, olives, cranberries, fruits, and vegetables. The Farmland Protection Policy Act (FPPA) DHS Directive MD 023-01, Environmental Planning Program, and COMDTINST M16475.1D require that the Coast Guard examine the impacts of its actions on prime or unique agricultural lands and minimize any potential impacts.

The Ustifluvents soil unit, the mapped soil unit for the project site, is not classified as prime farmland soil within Cameron County (NRCS, 2009). In addition, no unique farmland occurs within or adjacent to the project area.

The Coast Guard sent a letter to the NRCS in June 2009 to obtain information on any regulatory requirements under its jurisdiction for the proposed RFF South Padre Island construction (Appendix I). The Coast Guard received a response from the NRCS dated June 30, 2009 (Appendix I) stating the project should have no significant adverse impact on the environment or natural resources in the area and that NRCS does not require any permits, easements, or approvals for those activities.

#### ***Environmental Consequences***

##### No Action

Under the No Action Alternative, no construction would occur and there would be no adverse impacts to prime or unique farmland soils.

##### Proposed Action

Under the Proposed Action, no construction would occur within or adjacent to prime or unique farmlands and, therefore, there would be no adverse impacts to prime or unique farmland soils.

### **3.5 WATER RESOURCES**

#### ***Affected Environment***

The project site is located on the southern end of South Padre Island, which is one of many barrier islands located along the Gulf Coast, and is separated from the mainland by the Laguna Madre Bay. The Gulf of Mexico lies to the east of South Padre Island. The project site is located

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## **Affected Environment and Environmental Consequences**

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within approximately 1,000 feet of Laguna Madre Bay. Both water bodies support recreational activities including boating and fishing.

The groundwater at the project site is managed by the Texas Water Development Board and is located within Groundwater Management Area 16, the Live Oak Underground Water Conservation District. The groundwater at the project site is not included within a mapped aquifer (TWDB, 2007). The closest aquifer, the Gulf Coast aquifer, is located in the western portion of Cameron County. On South Padre Island, fresh groundwater is located in a shallow surface layer and underlain by salty groundwater that is hydraulically connected to the Laguna Madre Bay and the Atlantic Ocean. South Padre Island residents and businesses receive potable water from the Laguna Madre Water District.

The Clean Water Act (CWA) (33 U.S. Code [U.S.C.] 1251) prohibits unauthorized discharges into navigable waters of the United States. In addition, the CWA targets point source discharges, such as municipal wastewater outfalls, and nonpoint source discharges, such as stormwater discharges. Stormwater runoff and other nonpoint source pollution may cause adverse impacts to surface water resources. Stormwater discharges associated with construction activities that disturb a total of 1 or more acres of land must be permitted under the National Pollutant Discharge Elimination System (NPDES). Texas has an EPA-approved program for the control of wastewater and stormwater discharges in accordance with the CWA. The program is known as the Texas Pollutant Discharge Elimination System (TPDES), and it is broader in scope than the CWA in that it regulates point source discharges to groundwater as well as surface water. As part of TPDES General Permit requirements, an erosion and sediment control plan must be developed for construction activities that disturb more than 1 acre of land. The TCEQ administers the TPDES permitting program.

The Coast Guard sent a letter to TCEQ in June 2009 to obtain information on any regulatory requirements under its jurisdiction for the proposed RFF South Padre Island construction (Appendix I). To date, the Coast Guard has not received a response.

### ***Environmental Consequences***

#### **No Action**

Under the No Action Alternative, no construction would occur and there would be no impacts to surface water or groundwater resources.

#### **Proposed Action**

No significant or long-term impacts to surface or groundwater resources are expected as a result of the Proposed Action. The Proposed Action would not result in any discharges to navigable waters. During construction, ground disturbance at the project site would be limited to approximately 5,625 square feet (0.13 acre).

The Coast Guard would implement appropriate BMPs, such as installing silt fences and revegetating bare soils, to minimize surface water runoff from the site to Laguna Madre Bay. There are no surface water bodies on or adjacent to the project site that would be directly affected by construction activity. The construction of impervious surfaces within the project site would be limited to those structures (tower, shelter, and access roads) that require concrete foundations. The total increase in impervious surface area at the project site would be minor and is not expected to result in any adverse impacts to surface water resources. Although some minor

ground disturbance would be associated with these activities, the proposed construction would not occur in an aquifer recharge zone; therefore, these activities are not expected to affect groundwater resources in the area. Because less than 1 acre will be disturbed, neither a TPDES stormwater permit nor a NPDES permit would be required.

### 3.6 INFRASTRUCTURE AND UTILITIES

#### 3.6.1 Utility Availability

##### ***Affected Environment***

Utility services are currently available to the project site. Electricity service is provided by American Electric Power and telecommunication service is provided by AT&T.

##### ***Environmental Consequences***

###### No Action

Under the No Action Alternative, no change in existing conditions would occur and no impacts to area utilities would occur.

###### Proposed Action

Under the Proposed Action, no significant adverse impacts to utility availability would occur. The operation of RFF South Padre Island would require electric and telecommunication services. Power utilities currently surround the project site; power is provided to the 1923 Coast Guard Station Port Isabel building, located approximately 100 feet from the project site, and the existing Coast Guard Station located approximately 500 feet from the project site. Short electrical and telecommunication trenches would be excavated to connect to existing nearby local utility services. A new generator and 500-gallon propane tank would be installed to provide emergency backup power to the communications tower compound.

No disruption to utility services is anticipated during construction activities. Short-term utility usage increases (electricity and/or water) may be required during construction activities; however, these temporary needs would be limited in scope and easily accommodated by the existing infrastructure.

#### 3.6.2 Solid Waste Management

##### ***Affected Environment***

Private contractors provide solid waste collection and disposal services to the businesses and residents of South Padre Island.

##### ***Environmental Consequences***

###### No Action

Under the No Action Alternative, no change in existing conditions would occur and no impact to solid waste management availability would occur.

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## **Affected Environment and Environmental Consequences**

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### Proposed Action

Under the Proposed Action, no significant adverse impacts to solid waste management services are anticipated. Normal operations of RFF South Padre Island would not require solid waste collection and disposal services. Waste generated during the construction activities would be removed from the project site and taken to an appropriate disposal site. In all situations for which wastes requiring disposal are generated, waste manifests would be maintained indicating the quantity and type of wastes generated, the work required, the transportation service used, and the disposal location. The amount of waste generated would not cause a significant impact to local or regional solid waste management resources.

### **3.6.3 Drainage**

#### ***Affected Environment***

Stormwater at the project site flows east and south toward wetland areas, and then west in a small unnamed channel for approximately another 500 feet toward Laguna Madre Bay.

#### ***Environmental Consequences***

##### No Action

Under the No Action Alternative, no activity would be performed and no impacts to drainage would occur. Stormwater at the project site would continue to flow toward Laguna Madre Bay.

##### Proposed Action

Under the Proposed Action, no significant adverse impacts to drainage are anticipated. Construction activities could potentially increase sediment transport to Laguna Madre Bay. To reduce the potential adverse impacts associated with soil erosion, BMPs would be used to prevent erosion of soils from the project site. Grading and excavation of soils at the project site would be minimized to the greatest extent possible.

### **3.6.4 Transportation and Site Access**

#### ***Affected Environment***

The project site is bordered on the north by Wallace Reed Road, which provides site access from the main north-south road on the island, Padre Boulevard, and is bordered on the east by an unnamed Coast Guard road. The project site shares a driveway (Wallace Reed Road) with the existing Coast Guard station. Wallace Reed Road is maintained by the Town of South Padre Island.

#### ***Environmental Consequences***

##### No Action

Under the No Action Alternative, no construction would occur and no impacts to transportation or site access would occur.

### Proposed Action

Under the Proposed Action, no significant adverse impacts to transportation or site access are anticipated. A minor temporary increase in the volume of construction traffic on roads in the immediate vicinity of the project site could potentially result in a slower traffic flow for the duration of the construction phase. To mitigate potential delays, construction vehicles and equipment would be stored on site during project construction and appropriate signage would be posted on affected roadways. No road closures are anticipated. Operation and maintenance of the tower compound would require monthly visits by workers. No access roads would be constructed; the Town of South Padre Island would continue to maintain Wallace Reed Road, which would provide access to RFF South Padre Island for maintenance. Long-term impacts to transportation and circulation are not expected to be significant.

## **3.7 HAZARDOUS SUBSTANCES**

### ***Affected Environment***

Hazardous substances are defined as any solid, liquid, contained gaseous or semisolid waste, or any combination of wastes that pose a substantial present or potential hazard to human health and the environment. Improper management and disposal of hazardous substances can lead to pollution of groundwater or other drinking water supplies, and the contamination of surface water and soil. The primary Federal regulations for the management and disposal of hazardous substances are the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA).

No recognizable hazardous materials or wastes were observed at the project site during the April 7, 2009, site visit. Three leaking petroleum storage tanks have been identified in the past within a 0.5-mile radius of the project site, with the closest located approximately 0.13 mile to the northeast; however, the cases for all three of these sites have been closed and a hazard no longer exists (EDR, 2009). No other known hazardous waste handlers or facilities, leaking underground storage tanks, or brownfield sites were identified within a 1-mile radius of the project site (EDR, 2006). In addition, no facilities within a 1-mile radius of the project site have reported a toxic release to EPA (EPA, 2006). Therefore, hazardous wastes are not anticipated to be encountered during excavation and construction at the project site.

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, the Coast Guard would not construct the communication tower; therefore, there would be no additional generation of hazardous wastes at the project site.

#### Proposed Action

The Proposed Action is not anticipated to generate a substantial amount of hazardous wastes as a result of construction and operation of the communication tower. Hazardous substances specific to the construction and operation of RFF South Padre Island may include batteries, spent fuel and used oil, and obsolete or broken system components (e.g., computer parts and solar panels). These hazardous substances would be generated during construction, maintenance, or decommissioning of the tower and its components. At the project site, the only potential baseline hazardous substance would be the propane used to fuel the emergency generator. The Coast

Guard would handle (i.e., contain, store, transport, and dispose) all hazardous materials and wastes generated or discovered in accordance with applicable State and Federal regulations.

Routine maintenance and upkeep of the site (i.e., repairing and replacing system components) would normally include servicing, cleaning, or repairing the electronic equipment contained in the site compound or mounted on the tower. Materials and chemicals commercially available for use in electronic maintenance would be used, stored, and disposed of in accordance with applicable Federal, State, and local regulations. Routine maintenance on the backup generator (changing the engine oil, etc.) would generate regulated waste that would be properly managed. Additionally, any maintenance to the tower structure or site compound (painting, etc.) could involve regulated materials that would be properly managed.

### 3.8 RADIO FREQUENCY RADIATION

RF radiation (i.e., radio waves) can be defined as electromagnetic waves generated by the oscillation of a charged particle with a wave frequency (the number of sound waves per unit of time) in the RF range, which is usually between 10 kilohertz (kHz) and 300,000 megahertz (MHz) (Morris, 1992). Radio waves are radiated by antennas used for several applications, including cellular communications, radio broadcasts, and two-way radio communications. For comparison purposes, a handheld cellular phone broadcasts at a frequency of 824 to 849 MHz; a citizen band (CB) radio broadcasts at frequencies from 26.96 to 27.41 MHz; and a large urban FM radio station may broadcast at frequencies ranging from 88 to 108 MHz (Brain, 2002). Although RF radiation does not present as great a health hazard as “ionizing” radiation sources (which can cause molecular changes that may result in significant genetic damage) such as X-rays and gamma rays, high intensities of RF radiation can be harmful. Similar to microwaves, RF radiation can heat biological tissue rapidly, resulting in tissue damage, which is known as a “thermal” effect. The extent of this heating depends on several factors, including radiation frequency. Other factors include the size, shape, and orientation of the exposed object; duration of exposure; environmental conditions; and efficiency of heat dissipation (FCC, 1999).

Due to the surrounding populations and the existing communication sources in the surrounding area (radio stations, cellular telephones and associated towers, CB radios, etc.), radio waves currently exist within the project area.

For relatively low levels of exposure to RF radiation, the evidence of harmful biological effects is unproven (FCC, 1999). However, multiple sources of information list maximum permissible exposure, also known as permissible exposure limits (PELs), for RF radiation. The FCC adopted guidelines for RF radiation in 1996, which were developed by the American National Standards Institute and the Institute of Electrical and Electronics Engineers, Inc. in 1992. These exposure criteria identify the threshold level at which harmful biological effects may occur based on electric and magnetic field strength and power density. FCC guidelines are most stringent for the frequency range from 30 to 300 MHz, the range in which the human body absorbs RF radiation most efficiently. PELs were developed for two categories. The first category, which affects the occupational population, applies to human exposure to RF fields when people are exposed due to their employment, have been made fully aware of the potential for exposure, and can exercise control over their exposure (USCG, 2002b). The second category, which affects the general population, applies to human exposure to RF fields when the general public may be exposed or when personnel exposed because of their employment may not be aware of exposure or cannot

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## Affected Environment and Environmental Consequences

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exercise control over the exposure (USCG, 2002b). A significant impact would occur if exposure limits to the occupational or general population exceeded the maximum PEL.

Operating power is a major factor in determining exposure limits. Commercial radio and television stations operate in a range from a few hundred watts up to millions of watts. The FCC only requires that tower-mounted installations be evaluated if antennas are mounted lower than 10 meters (32.8 feet) above the ground and the total power of all channels being used is more than 1,000 watts of effective radiated power.

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, the Coast Guard would not construct RFF South Padre Island; therefore, there would be no additional generation of RF radiation at the project site. RF radiation would remain at the existing level.

#### Proposed Action

Under the Proposed Action, RFF South Padre Island would be constructed within range of existing communication towers, which already transmit radio waves. The proposed operating power of the radio transmitter for RFF South Padre Island would be a maximum of 50 watts, with frequencies ranging from approximately 156 to 414 MHz. Based on this operating power, it is reasonable to assume that the potential for harmful exposure to RF radiation would be extremely low.

Additionally, the change in broadcast frequencies resulting from the technology upgrades would not significantly affect safety. At the tower, only two of the four antennas would transmit signals; the other two antennas would receive signals, and receiving signals pose no exposure risk. The transmitters would not operate continuously; they would only generate radio waves while being used to communicate with distressed boaters or Coast Guard vessels.

The risk of exposure is further minimized because the tower would be 400 feet tall. The distance between the antennas (on top of the tower) and human populations would be too great to present a significant exposure risk.

No research currently exists to prove that harmful biological effects can result from exposure to low-level RF radiation. A significant impact would occur if exposure limits to the occupational or general population exceeded the maximum PELs; however, the Coast Guard has designed the tower and would implement safety measures to ensure that exposure limits are not exceeded.

Additionally, the proposed communication tower would meet guidelines set forth in Coast Guard Commandant Instruction M10550.25A, *Electronics Manual* (USCG, 2002b). RFF South Padre Island is not anticipated to substantially increase RF radiation in the project area.

## **3.9 BIOLOGICAL RESOURCES**

### **3.9.1 Review of Regulatory Programs Affecting Biological Resources**

Biological resources include wildlife, vegetation, threatened and endangered species, wetlands, and floodplains. These biological resources are protected by several EOs, including EO 13186 (Protection of Migratory Birds), EO 13112 (Invasive Species), EO 11990 (Protection of



Wetlands), and EO 11988 (Floodplain Management), as well as several Federal laws, including the Migratory Bird Treaty Act (MBTA), the Endangered Species Act (ESA), and the CWA. A discussion of these policies is provided in the following subsections.

### 3.9.2 Wildlife

#### *Affected Environment*

The project site contains little wildlife habitat because it is located within a developed area close to buildings and mowed areas and consists primarily of a disturbed dirt surface with sparse vegetation. No aquatic habitat exists on the project site. The Laguna Madre Bay contains seagrass beds that provide breeding grounds for tremendous numbers of shrimp, crabs, and finfish, including black drum, speckled sea trout, and redfish. Terrestrial wildlife in the project area includes rodents, coyotes, badger, raccoon, opossum, kangaroo rat, bats, spotted ground squirrel, many species of birds, and snakes, including the western diamondback, the massasauga, and the Texas coral snake.

The project site is located within the coastal route of the Central Flyway, which is a regular avenue of travel for migrating land and water birds. A migratory bird is any species that lives, reproduces, or migrates within or across international borders at some point during its annual life cycle. Several parks, including the Padre Island National Seashore and the South Padre Island Birding and Nature Center (both north of the project site), and natural areas located along the Texas coastal zone are home to numerous migratory bird species. Because of Padre Island's location on the central flyway, a major migratory route, about 350 species of birds have been documented within the Padre Island National Seashore (NPS, 2007). Migratory birds in the South Padre Island area include warblers, tanagers, orioles, and thrushes in wooded areas, and a wide range of shorebirds and waterfowl in wetland areas.

The MBTA was enacted to ensure the protection of shared migratory bird resources and prohibits the take and possession of any migratory bird, their eggs, or nests, except as authorized by a valid permit or license. In addition, EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds), directs Federal agencies whose activities have or are likely to have a measurable, negative effect on migratory bird populations to develop and implement a Memorandum of Understanding (MOU) with the U.S. Fish and Wildlife Service (USFWS) to promote the populations of migratory bird species.

In compliance with EO 13186, the Coast Guard has negotiated an MOU with the USFWS for new antenna tower sites constructed on Coast Guard property to support the Rescue 21 program. In accordance with that MOU, the Coast Guard sent a letter in June 2009 to the USFWS requesting concurrence with the Coast Guard's determination that the Proposed Action includes all reasonable measures to avoid affecting migratory birds (Appendix I). No response has been received to date.

Avian collision with towers tends to occur more often at night, primarily because birds migrate more during nighttime. Foggy or cloudy nights have been shown to disrupt navigation, and the effect of tower lights on birds during cloudy conditions may additionally complicate navigation at night (Woodlot, 2003). It has been noted that strobe or incandescent blinking lights appear to affect birds less than red steady-burning lights (Gehring et al., 2006). Tower height also plays a role in avian mortality, though the exact height threshold for mortality is undetermined. Shorter

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towers may not pose as great a risk to migrating birds as taller towers (above 500 feet) (Crawford and Engstrom, 2001 in Woodlot, 2003; Gehring, 2004). A recent 3-year study in Michigan (Gehring et al., 2009) and preliminary data from an on-going study at a 350-foot-tall Coast Guard Rescue 21 self supported tower in Cape May, New Jersey (Manville, 2009), suggest that self supported towers are not involved in large numbers of avian fatalities.

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, no construction would occur and there would be no impacts to wildlife.

#### Proposed Action

Under the Proposed Action, no significant adverse impacts to wildlife are anticipated. Construction of the proposed tower would occur on a previously disturbed area and would remove a small amount of herbaceous vegetation. Construction of the tower and associated equipment would minimally impact common wildlife species that may be present within the project site. No significant habitat loss or conversion would result from the Proposed Action.

Communication towers present a potential risk for collisions to migratory birds. Through their MOU with USFWS, the Coast Guard has considered the USFWS *Interim Guidelines for Recommendations on Communications Tower Siting, Construction, Operation, and Decommissioning* (USFWS, 2000) to the maximum extent practicable. In designing the tower, all reasonable measures to avoid affecting migratory birds have been undertaken. Specifically, the Coast Guard proposes to construct a self-supported lattice tower, a design which is believed to cause far less avian mortality than towers supported by multiple guy wire cables. In accordance with FAA Advisory Circular AC 70/7460-1K, *Obstruction Marking and Lighting*, the proposed tower would not require daytime lighting if it is painted, but both tower options would require nighttime lighting (FAA, 2007) that may disrupt navigation of migratory birds during conditions of poor visibility. The proposed tower would be 413 feet tall (including the antennas), which is below the threshold (500 feet) generally thought to pose the greatest risk to migrating birds.

The parks and conservation areas on Padre Island are focused on conserving ecologically critical habitats to preserve avian resources. The potential threats to these areas are development, pollution, and recreational and development overuse. The proposed Coast Guard tower would be located outside of these designated areas, would be constructed in an existing developed area, and BMPs would be applied to construction activities; therefore, construction and tower use would not result in adverse impacts to parks, natural areas, or conservation areas in the vicinity of the project site.

### **3.9.3 Vegetation**

#### ***Affected Environment***

The project site has been previously disturbed and is comprised of unvegetated dirt areas and grasses including Bermudagrass (*Cynodon dactylon*), common carpetgrass (*Axonopus fissifolius*), little bluestem (*Schizachyrium scoparium*), and Vasey's grass (*Paspalum urvillei*).

## Affected Environment and Environmental Consequences

### Environmental Consequences

#### No Action

Under the No Action Alternative, no ground disturbance would occur and there would be no impacts to vegetation.

#### Proposed Action

Under the Proposed Action, no significant adverse impacts to vegetation are anticipated. Construction would occur in a previously disturbed area containing mostly dirt and grasses. A minimal amount of herbaceous vegetation would be disturbed during equipment staging. The Coast Guard would use routine vegetative maintenance to discourage the establishment of invasive plant species after construction.

### 3.9.4 Threatened and Endangered Species

#### **Affected Environment**

Under Section 7 of the ESA, as amended, Federal agencies, in consultation with the USFWS, or the National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) for marine mammals and fish, are required to evaluate the effects of their actions on special status species of fish, wildlife, and plants, and their habitats, and to take steps to conserve and protect these species. Special status species are defined by the USFWS as plants or animals that are candidates for, proposed as, or listed as sensitive, threatened, or endangered.

The USFWS lists the following federally endangered (E) and threatened (T) species for Cameron County (USFWS, 2008):

**Table 3-2: USFWS Threatened and Endangered Species in Cameron County, TX**

Common Name	Scientific Name	Species Group	Status
Gulf Coast jaguarundi	<i>Herpailurus (=Felis) yagouaroundi cacomitli</i>	Mammal	E
Ocelot	<i>Leopardus (=Felis) pardalis</i>	Mammal	E
West Indian manatee	<i>Trichechus manatus</i>	Mammal	E
Green sea turtle	<i>Chelonia mydas</i>	Reptile	T
Loggerhead sea turtle	<i>Caretta caretta</i>	Reptile	T
Kemp's Ridley sea turtle	<i>Lepidochelys kempii</i>	Reptile	E
Hawksbill sea turtle	<i>Eretmochelys imbricata</i>	Reptile	E
Leatherback sea turtle	<i>Dermochelys comacea</i>	Reptile	E
Texas ayenia	<i>Ayenia limitaris</i>	Flowering Plant	E
South Texas ambrosia	<i>Ambrosia cheiranthifolia</i>	Flowering Plant	E
Piping plover	<i>Charadrius melodus</i>	Bird	T (CH)
Northern aplomado falcon	<i>Falco femoralis septentrionalis</i>	Bird	E
Brown pelican	<i>Pelecanus occidentalis</i>	Bird	E

E= endangered, T=threatened, CH=designated critical habitat

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## **Affected Environment and Environmental Consequences**

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In addition to the 13 federally threatened or endangered species listed by the USFWS, Texas lists 38 State threatened or endangered wildlife species and one State endangered plant. Although federally designated critical habitat for the piping plover is located approximately 0.5 mile south of the project site, no critical habitat is located at the project site.

The proposed project site does not contain habitat suitable for any federally listed species due to the disturbed nature of the site and the developed nature of the project area. In accordance with Section 7(a)(2) of the ESA, the Coast Guard sent a coordination letter in June 2009 to the USFWS and the TCEQ, State Parks and Wildlife, requesting concurrence in their determination that the Proposed Action would not likely adversely affect or jeopardize the continued existence of any endangered or threatened species or critical habitat (Appendix I). No responses have been received to date.

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, there would be no physical changes to the project site and no adverse impacts to threatened or endangered species or their habitats.

#### Proposed Action

Under the Proposed Action, no significant adverse impacts to threatened or endangered species or critical habitats are anticipated. Construction of RFF South Padre Island would occur in a previously disturbed area and would result in only a minimal disturbance to herbaceous vegetation for equipment staging on the project site.

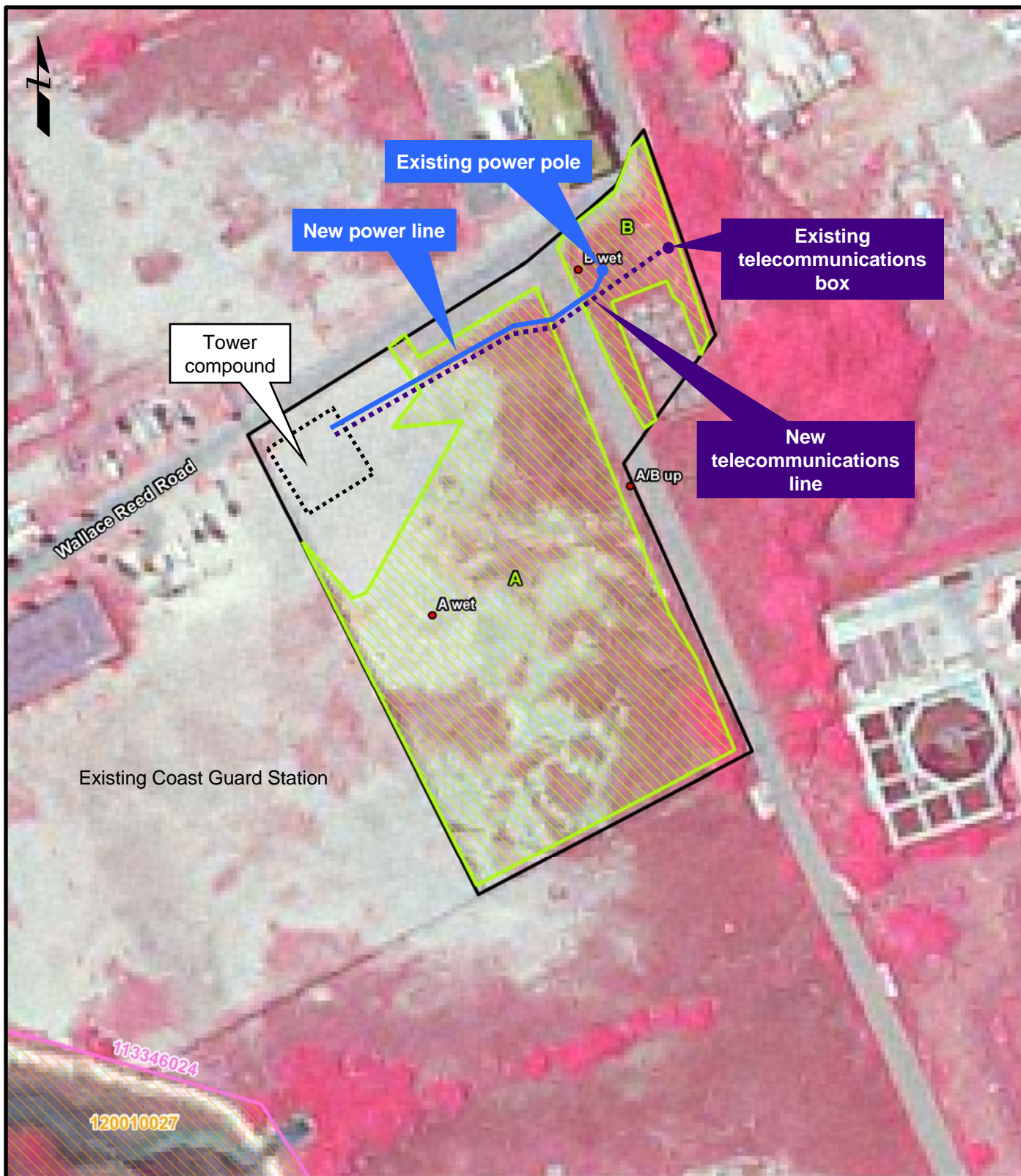
### **3.9.5 Wetlands**

#### ***Affected Environment***

The U.S. Army Corps of Engineers (USACE) and EPA jointly define wetlands as those areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Jurisdictional waters of the United States, including wetlands, are protected under Section 404 of the CWA. In addition, EO 11990 (Protection of Wetlands) requires Federal agencies to minimize the loss of wetlands. The NEPA compliance process requires Federal agencies to consider direct and indirect impacts on wetlands that may result from federally funded actions.

Because the USFWS National Wetlands Inventory map identified wetlands within the project vicinity (USFWS, 2009a), a wetlands delineation of the project area was conducted on December 16, 2008 (Crouch, 2009). Two separate wetland areas were delineated totaling 2.01 acres (Figure 6). The project site does not contain any navigable waters of the United States.

In accordance with the CWA, the Coast Guard submitted a letter and wetlands delineation report to the USACE in April 2009 requesting a jurisdictional determination (Appendix I). On October 6, 2009, the USACE issued Permit No. SWG-2009-00385 allowing utility trenching to proceed.



0 50 100  
Feet

- Data Points
- Wetlands
- Site
- NHD Flowline
- NHD Waterbody
- NHD Area

NHD = U.S. Geological Service  
National Hydrography Dataset

Title

**Wetlands**



Proj No: 15301804

Figure **6**

Client: U.S. Coast Guard

Project: RFF South Padre Island

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, there would be no physical changes to the site and no adverse impacts to wetlands.

#### Proposed Action

Based on the results of the wetland delineation, the Coast Guard determined that it could situate the proposed tower compound in an area that would completely avoid construction in or disturbance of the jurisdictional wetlands in the project area (Figure 6). To reduce the potential for indirect impacts to downstream waters and the adjacent wetlands from soil erosion and sediment transport, erosion and sediment control BMPs (i.e., sediment barriers surrounding the construction area) would be used during and after construction.

The telecommunications and electrical lines would require trenching within the wetland to the east of the proposed site (Figures 4 and 6). Approximately 220 total linear feet of trenching would occur in the wetland; the width of the trench would be approximately 2 feet, resulting in approximately 520 square feet, or 0.01 acre of wetland disturbance. The Coast Guard obtained USACE Nationwide Permit 12 Utility Line Activities prior to construction. Nationwide Permit 12 did not require the Coast Guard to restore the disturbed wetland areas once construction is complete. Restoration was limited to retaining the top six inches of topsoil, storing it in a location separate from other removed soil, and placing it back on the top of the filled trenches. With implementation of mitigation measures required under Nationwide Permit 12, the Proposed Action would not result in permanent impacts on wetlands.

### **3.9.6 Floodplains**

#### ***Affected Environment***

Flood Insurance Rate Maps (FIRMs) and/or Flood Hazard Boundary Maps (FHBMs) outline flooding risks and define the 100-year floodplain for communities that are members of the National Flood Insurance Program (NFIP). The 100-year floodplain designates the area having a 1.0-percent chance of being inundated during a storm in any given year. These maps, prepared by the Federal Emergency Management Agency (FEMA), also identify the 500-year floodplain, which designates the area having a 0.2-percent chance of being inundated during a storm in any given year. EO 11988 (Floodplain Management) requires Federal agencies to minimize occupancy of and modification to floodplains. Specifically, the EO prohibits Federal agencies from funding construction in the 100-year floodplain (500-year floodplain for critical facilities) unless there are no practicable alternatives.

According to the FIRM for South Padre Island, Texas (panel number 4801150001D), the project site is located in Flood Zone A8, which designates an area within the 100-year floodplain (FEMA, 1999).



### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, there would be no physical changes to the project site and no adverse impacts to floodplains.

#### Proposed Action

Under the Proposed Action, construction would occur within the 100-year floodplain; however, no practicable alternatives exist because the majority of South Padre Island is within the 100-year floodplain, including all of the Coast Guard-owned property. In addition, the Coast Guard conducted a diligent search for alternative tower sites and has determined that they cannot fulfill their purpose under the Rescue 21 program without construction of RFF South Padre Island on the project site.

The Coast Guard completed the 8-Step Process for Floodplain Management for the Proposed Action (Appendix II). Although the Proposed Action would result in some modification of the floodplain, it would not impede movement of floodwaters within the floodplain because the addition of the tower, the fence, and other features within the compound would not block or prevent floodwaters from flowing around the site, and thus would not increase the level of floodwaters above existing conditions. Therefore, no adverse impacts to floodplains are expected as a result of the Proposed Action.

### **3.10 CULTURAL RESOURCES**

Organized seaside and coastal rescue aid efforts in the United States can be traced back as early as 1787 to colonial Massachusetts, where volunteer efforts established the Massachusetts Humane Society to rescue and aid victims of shipwrecks along the state's seaboard. The first official Federal involvement was on August 7, 1789, when an agency eventually known as the U.S. Lighthouse Service was established under the Department of the Treasury. Aside from services rendered at lighthouses, specific life-saving efforts were conducted entirely by volunteers until August 14, 1848, when Congress appropriated funds to erect life-saving buildings and purchase equipment to be used by volunteer organizations. The Lighthouse Board was established on October 9, 1852, and administered the nation's lighthouse system as part of the U.S. Lighthouse Service until July 1, 1910. The U.S. Life-Saving Service was established as a separate agency under the Department of the Treasury in June 1878. The U.S. Life-Saving Service remained an independent agency until January 28, 1915, when it was merged with the U.S. Revenue Cutter Service to form the U.S. Coast Guard. The U.S. Lighthouse Service continued to operate until July 1, 1939, when it, too, was transferred to the jurisdiction of the U.S. Coast Guard.

#### ***Affected Environment***

Cultural resources include archaeological and historical objects, sites, and districts; historic buildings and structures; cultural landscapes; and sites and resources of concern to local Native Americans and other ethnic groups. The NHPA, as amended, outlines Federal policy to protect historic sites in cooperation with Tribes, States, and local governments and established the National Register of Historic Places (NRHP). Subsequent amendments designated the State Historic Preservation Office (SHPO) as the office designated by the Governor to administer the

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## Affected Environment and Environmental Consequences

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State's historic preservation program and duties described in 36 CFR Part 61, including nominating properties to the NRHP. The NHPA also created the Advisory Council on Historic Preservation (ACHP), the Federal agency responsible for providing commentary on Federal activities, programs, and policies that impact historic resources.

Section 106 of the NHPA and its implementing regulations (36 CFR 800) outline the procedures to be followed in the documentation, evaluation, and mitigation of impacts to historic properties, defined as properties that are listed in or eligible for listing in the NRHP. The Section 106 process applies to any Federal undertaking that has the potential to affect historic properties. The Section 106 process requires the identification of historic properties that may be affected by an undertaking and consideration of ways to avoid, minimize, and mitigate adverse effects. Section 110 of the NHPA outlines the obligations Federal agencies have in regard to historic resources under their ownership.

A URS architectural historian, qualified in the discipline of architectural history under the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61), conducted an assessment of the project's potential to affect historic properties within the Area of Potential Effects (APE). In April 2009, background research and a windshield survey of the areas surrounding the project site were conducted to determine historic properties within the APE of the project site. Although the focus of the survey efforts was properties 50 years of age or older, any properties less than 50 years of age that might meet NRHP Criteria Consideration G were also considered. Unless written documentation was found, age determinations were made based on physical characteristics and visual analysis.

The APE for aboveground resources has been identified by the Coast Guard as the area within a 2-mile radius of the proposed tower location. For archaeological resources, the APE is defined by the footprint of the tower compound, as well as any area surrounding the tower that would be potentially disturbed during its construction or installation. Information about previously identified archaeological resources located within a 1-mile radius of the proposed tower site was gathered to provide some information on the archaeological sensitivity of the project area.

Background research was conducted online through the National Register Information System (NRIS) and the Texas Historic Sites Atlas and at the Texas Historical Commission (THC) during a site visit on April 6–7, 2009, to identify any recorded aboveground and archaeological resources within the APE. An interview was also conducted with Steve Hathcock, Chairperson of the South Padre Island Historical Preservation Commission and co-founder and President of the South Padre Island Historical Foundation, to identify any known historic resources within the APE. A cultural resources report, *Section 106 Compliance Needs Assessment Report for Construction of RFF South Padre Island, Cameron County, Texas* (USCG, 2009a) was prepared for THC review.

In addition, a Visual Impact Study was completed to assess the potential visual impacts on historical resources from construction of a new communications tower. Photo simulations of the proposed tower alternatives were created using field data and photographs. The photo simulations were based on established critical view points from historic sites where the proposed communication tower would be visible (USCG, 2009b; Appendix III).

The findings of the cultural assessment and the visual impact study are summarized in this section.



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**Aboveground Resources:** A review of the NRIS identified two historic properties—the Brazos Santiago Depot Site and the Point Isabel (Port Isabel) Lighthouse, both NRHP-listed properties. A review of the THC files identified the 1923 USCG Station Port Isabel, a Texas Historic Landmark (THL). Records at the USCG Historian’s Office revealed three additional potential historic properties: the 1864 Brazos Padre Island Lighthouse Site, the 1881 Life-Saving Station Brazos Santiago Site, and the 1879 Brazos Santiago Light Site. Two of the six properties are currently extant, only one is located within the aboveground APE. The 1923 USCG Station Port Isabel is a potential historic property that is located within the APE. The Point Isabel Lighthouse (Port Isabel) is a historic property located just outside the APE, but within the viewshed.

**Archaeological Resources:** Four properties are no longer extant: the Brazos Santiago Depot, the 1864 Brazos Padre Island Lighthouse, the 1881 Life-Saving Station Brazos Santiago, and the 1879 Brazos Santiago Lighthouse. Of these four archaeological resources, only one has been formally identified and evaluated for the NRHP. The Brazos Santiago Depot Site is a historic property that is located within the APE and is an archaeological site. General locations for the 1864 Brazos Padre Island Lighthouse Site, the 1881 Life-Saving Station Brazos Santiago Site, and the 1879 Brazos Santiago Lighthouse Site have been determined; however, precise locations are unknown at this time.

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, no construction would occur and no cultural resources would be impacted.

#### Proposed Action

According to research and State Archaeologist Bill Martin at the THC, no previously-identified archaeological sites are located within the tower footprint or a 1-mile radius of the proposed tower location. An archaeological survey to identify additional archaeological resources was not conducted as a part of this study, and the presence of archaeological resources within the area of ground disturbance associated with the Proposed Action is unknown. If, during the course of construction, unanticipated archaeological resources are uncovered, the Coast Guard would consult with the SHPO regarding appropriate treatment measures.

The Coast Guard determined that the construction of a 400-foot tall communications tower in either design option (painted without daytime lights or unpainted with daytime lights) would have no adverse effect on the Brazos Santiago Depot Site, the 1864 Brazos Padre Island Lighthouse Site, the 1881 Lifesaving Station Brazos Site, and the 1879 Brazos Santiago Light Site, as these are archaeological resources not subject to visual effects. There would be no adverse effect to the Port Isabel Lighthouse located across Laguna Madre from the project site. Although visible from the 1923 Station building, the proposed project would not have a significant adverse effect on the 1923 Station Port Isabel Coast Guard building.

Consideration was given to the visual effects of the proposed RFF tower during the daytime for both design options—either a painted tower without daytime lighting, with aviation orange and white painted bands; or an unpainted tower with medium-intensity (20,000-candela) white strobe lights which will flash 40 times per minute. Due to the mass of a self-supported tower, a painted tower may be more visually obtrusive than an unpainted tower with strobe lights.

Consideration was also given to the visual effect during the nighttime of the proposed tower, which will use 2,000-candela, red LED beacon lights which will flash 20 times per minute, and steady-burning low-intensity (32.5-candela) red obstruction lights. Both of the tower options (painted and unpainted) will use the same nighttime lighting scheme.

In accordance with Section 106 of the NHPA, an adverse effect determination requires that the Coast Guard engage the THC and other relevant stakeholders in consultation to resolve the adverse effect. As part of the consultation process, the Coast Guard must consider ways to avoid the adverse effect, and if none can be identified, ways to minimize and mitigate the adverse effect. Mitigation measures, as determined through the Section 106 consultation process, would be included in a Memorandum of Agreement that serves as evidence of the successful resolution of adverse effect. The Coast Guard has initiated Section 106 consultation with the THC and the present owners of the 1923 Station Point Isabel Coast Guard Building. In compliance with Section 106 of the NHPA, the Coast Guard sent a letter in July 2009 along with the *Section 106 Compliance Needs Assessment Report for Construction of RFF South Padre Island, Cameron County, Texas* to the THC requesting project review. Although Section 106 consultations are continuing, the USCG has determined that there are no significant direct or indirect adverse visual effects to cultural resources.

### 3.11 RECREATION

#### ***Affected Environment***

Though the project site is located on the southern end of South Padre Island, which is a prime location for marine recreational activities, such as boating, fishing, swimming, and surfing, the Coast Guard Station property is not available to the public for recreational activities.

Many multi-story resort hotels and condominiums have been built along the Gulf of Mexico coastline. South Padre Island is home to many water sport activities, including riding personal watercraft, dolphin watching, boating, fishing, swimming, and windsurfing. A large water park is located on the island and other recreational activities include horseback riding on the beach, camping, and ecological tours that explore Padre Island National Seashore, which is approximately 35 miles north of the project site.

#### ***Environmental Consequences***

##### No Action

The No Action Alternative would not result in any direct impact to recreational resources because no action would be taken. However, if RFF South Padre Island is not constructed, there could be an indirect effect on the safety of citizens participating in recreational marine activities in the adjacent recreational water areas because the numerous deficiencies in the current Coast Guard communications system would not be corrected. The unavailability of equipment, existing coverage gaps, and inadequate channel capacity would continue to contribute to degraded command and control and could result in delayed or unanswered calls for assistance from commercial and recreational boaters. The current system's inability to determine the location of distressed vessels or hoax callers could result in wasted resources, damaged property, and lost lives.

### Proposed Action

The Proposed Action would benefit marine commercial and recreational users in the vicinity of the project site by ensuring a more reliable and efficient response by the Coast Guard in emergency situations.

Since the Proposed Action would occur on Coast Guard-owned property that is not available to the public for recreation, there would be no reduction in the amount of space available for recreational activities. The tower would be visible from local parks and beaches, but it is not anticipated that the Proposed Action would result in any negative impacts to recreational resources.

## 3.12 VISUAL RESOURCES

### ***Affected Environment***

Visual resources refer to the landscape character (i.e., what is seen), visual sensitivity (i.e., human preferences and values regarding what is seen), scenic integrity (i.e., degree of intactness and wholeness in landscape character), and landscape visibility (i.e., relative distances of seen areas) of a geographically defined viewshed. The APE for visual resources is within 2 miles of the proposed tower location.

The project site lies at 5 feet amsl and the surrounding areas are generally level—the highest elevation within the 2-mile APE is less than 20 feet amsl. The proposed tower site is within the grounds of Coast Guard Station South Padre Island and adjacent to the 1923 Coast Guard Station Port Isabel Building. South Padre Island is a popular tourist destination that has many high-rise (between 100 and 391 feet tall) hotels and condominium buildings. The closest high-rise building is located approximately 0.6 mile away from the proposed tower site to the northeast.

A *Visual Impact Study* was conducted to identify any potential adverse effect on cultural resources considered critical viewpoints within the viewshed (i.e., actual visibility of the proposed structure). The viewpoints from these historic properties are also considered representative of views for residents and visitors in the project area and were used to determine impacts of the Proposed Action and alternatives on the project area viewshed (USCG, 2009b) (Appendix III).

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, no new construction or operations would occur and there would be no impacts to visual resources.

#### Proposed Action

RFF South Padre Island would be visible to residents and visitors in the vicinity of the project site during the daytime for both tower options (painted without lights or unpainted with lights). Both tower options would require nighttime lighting. Either of the two options for the Proposed Action (i.e., a painted tower with no daytime lights or an unpainted tower with high-intensity daytime lights) would result in no significant visual impact to residents and visitors to the project area.

## **Affected Environment and Environmental Consequences**

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The Coast Guard recognizes that the proposed tower may have an adverse visual impact for those with an unobstructed view of the project site, which includes: residents, workers, and tourists on South Padre Island; boaters in the Gulf of Mexico and Laguna Madre; residents, workers, and tourists in the town of Port Isabel; and visitors to the north end of Boca Chica beach. However, the existing viewshed of the site includes an array of multi-story resort hotels and condominiums up to approximately 391 feet tall. Additionally, most of the residences and businesses on South Padre Island are oriented toward the ocean, away from the project site, which will help to minimize visual impacts to those properties. The vegetation and topography of the area will also help to block the view of the tower from many of the properties within the APE. Although the new tower would be visible, the tower would not have a significant direct or indirect adverse visual impact. The viewshed in the area of the proposed tower is not part of a legally protected resource area, such as a park.

As a comparison, the Coast Guard took a photograph the USCG Rescue 21 Project constructed tower at RFF Fire Island (Figure 7 below). The photograph was taken from 260-ft away which is closer than the distance the proposed RFF South Padre Island tower will be from the 1923 Station (275-ft).

Considering this, the Coast Guard has determined that the visual impact does not result in a significant impact to human health or the environment.

## **Affected Environment and Environmental Consequences**

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**Figure 7: Photo of a 400 Ft tall galvanized tower taken 260-ft away, RFF Fire Island**



### 3.13 SOCIOECONOMIC RESOURCES

#### *Affected Environment*

Social and economic resources include elements unique to the human environment, such as population, culture, employment, business activities, tax base, housing characteristics, and education. These indicators can be used to measure the influence of new investments in the local economy. The investments can be temporary, such as those related to construction, or they can be more permanent, such as those related to the operation and maintenance of facilities. A “ripple effect” is often observed, as indirect economic activities such as demand for goods and services respond to the initial direct economic stimulus. The indicators can be evaluated to determine the potential for a proposed project to cause temporary or long-term social and economic effects. Beneficial social and economic effects are considered significant if they result in a measurable increase in annualized rates of employment, personal income, or business activity either nationally or within the local economy of the project area. Adverse effects result from boom/bust economic cycles and temporary increased demand for goods and services beyond existing capacity. In addition, adverse effects to property values could result if the project reduces the desirability of the property.

The U.S. Census 2000 indicates a population of 2,422 for the Town of South Padre Island. The total work force in 1999 was 1,268 people, consisting of 58.6 percent of the total population. The primary industries were: 1) arts, entertainment, recreation, accommodation, and food services; 2) educational, health, and social services; and 3) retail trade. Median household income in 1999 was \$45,417 (USCB, 2000). The estimated number of peak inhabitants in 2008 was 5,900 (TSPI, 2009b). Due to the large number of visitors, the resident population is only a small percentage of the total number of people who are in the Town of South Padre Island at any given time.

The U.S. Census 2000 indicates a population of 379,874 for Cameron County, Texas. The total work force in 1999 was 140,028 people, consisting of 53.54 percent of the total population. The primary industries were: 1) educational, health, and social services; 2) retail trade; and 3) professional, scientific, management, administrative, and waste management services. Median household income in 1999 was \$29,589 (USCB, 2000).

The U.S. Census 2000 indicates a population of 24,326,974 for the State of Texas. The total work force in 1999 was 11,470,560 people, consisting of 65.2 percent of the total population. The primary industries were: 1) educational, health, and social services; 2) retail trade; and 3) professional, scientific, management, administrative, and waste management services. Median household income in 1999 was \$39,927 (USCB, 2000).

South Padre Island’s natural beauty and access to outdoor recreational activities attract many vacationers during peak winter and spring months. According to estimates by the South Padre Island Chamber of Commerce, during tourist season up to 5,000 people work on the island to accommodate the town’s 20,000 to 25,000 annual tourists (SPI COC, 2009).

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, no construction would occur and there would be no change to social and economic resources when compared to existing conditions.

#### Proposed Action

Under the Proposed Action, no adverse impacts to social and economic resources are anticipated. The most tangible beneficial effects of the Proposed Action would be better Coast Guard communications and improved effectiveness of search and rescue operations. This would result in increased public safety and possibly reduced loss of human life, as well as reduced property losses.

Local equipment would be purchased and local labor would be used to the greatest extent practicable to construct RFF South Padre Island. This would result in both direct and indirect spending in the local community. The amount of funds introduced into the local economy during the construction phase would be limited in amount and duration. Ongoing expenses for the operation and maintenance of RFF South Padre Island would be minor. The beneficial local economic effects would, therefore, not be significant. Adverse social and economic effects would not be expected due to the small number of workers required to construct the tower and associated equipment.

### **3.14 LAND USE**

#### **3.14.1 Coastal Zone**

##### ***Affected Environment***

The Texas Coastal Coordination Council (CCC) oversees the Texas Coastal Management Program (CMP), which is authorized by NOAA to administer the CZMA. Any Federal or federally funded projects in Texas's Coastal Zone must be consistent with the enforceable policies of the Texas CMP (CCC, 2009). Although Federal lands are excluded from Texas's CMP under 15 CFR 923.33, any activity on Federal lands that has reasonably foreseeable coastal effects must be consistent with the Texas CMP. Because construction of RFF South Padre Island has potential coastal zone spillover effects, the Coast Guard is required to evaluate the Proposed Action relative to the Texas CMP and submit either a consistency determination or a negative determination to the Texas CCC.

The Coast Guard sent an initial coordination letter to the Texas CCC in June 2009 (Appendix I). To date, the Coast Guard has not received a response.

### ***Environmental Consequences***

#### No Action

Under the No Action Alternative, no construction would occur and there would be no impacts to the coastal zone.

## Affected Environment and Environmental Consequences

### Proposed Action

Under the Proposed Action, a communication tower would be constructed on South Padre Island in the Texas Coastal Zone. The Coast Guard has reviewed the enforceable policies of the Texas CMP and determined that the Proposed Action would not result in any coastal spillover effects. This EA serves as the Coast Guard's consistency determination. A complete evaluation of Texas coastal policies as they relate to the Proposed Action is provided in Table 3-3.

**Table 3-3: Texas Coastal Management Program Consistency Evaluation – Policies of Texas Administrative Code Title 31, Part 16, Chapter 501, Subsection B**

Policy	Is the Proposed Action Consistent?	Evaluation of Consistency
§501.13 <i>Administrative Policies</i> Provides directives for agency and subdivision rules and ordinances subject to the TCMP goals and policies, as provided in 31 TAC 501.10 (relating to Compliance with Goals and Policies).	Consistent	The Proposed Action is a federal agency action.
§501.15 <i>Policy for Major Actions</i> States that, prior to taking a major action, the agencies and subdivisions having jurisdiction over the activity shall meet and coordinate their major actions relating to the activity. No agency or subdivision shall take a major action that is inconsistent with the goals and policies of the chapter.	Consistent	The Proposed Action is a federal agency action and is consistent to the maximum extent practicable with the goals and policies of this chapter. This draft EA provides the Texas CCC the opportunity to review and comment on the Proposed Action.
§501.16 <i>Construction of Electric Generating and Transmission Facilities</i> Regulates the construction of electric generating facilities and electric transmission lines in the coastal zone.	Not applicable	The Proposed Action would not involve the construction of any electric generating or electric transmission lines.
§501.17 <i>Construction, Operation, and Maintenance of Oil and Gas Exploration and Production Facilities</i> Regulates oil and gas exploration and production on submerged lands.	Not applicable	The Proposed Action would not involve the construction or operation of oil and gas facilities or involve any exploration for oil and gas.
§501.18 <i>Discharges of Wastewater and Disposal of Waste from Oil and Gas Exploration and Production Activities</i> Regulates the disposal of oil and gas waste in the coastal zone and the discharge of oil and gas exploration and production wastewater in the coastal zone.	Not applicable	The Proposed Action would not involve the discharge of any oil and gas wastewater.
§501.19 <i>Construction and Operation of Solid Waste Treatment, Storage, and Disposal Facilities</i> Regulates the construction and operation of new and existing solid waste facilities and hazardous waste facilities located within the coastal zone.	Consistent	The Proposed Action would not involve construction or operation of solid waste facilities. No hazardous waste would be placed within the coastal zone. All solid and hazardous waste generated during Proposed Action activities would be disposed of in accordance with State and local regulations and would not affect the state of Texas's Coastal Natural Resource Areas.



## Affected Environment and Environmental Consequences

Policy	Is the Proposed Action Consistent?	Evaluation of Consistency
§501.20 <i>Prevention, Response, and Remediation of Spills</i> Governs the prevention of, response to and remediation of coastal oil spills and provides for measures to prevent coastal oil spills and to ensure adequate response and removal actions. Also governs the assessment of damages to natural resources injured as the result of an unauthorized discharge of oil into coastal waters.	Consistent	The Proposed Action would not involve the discharge of oil. Construction BMPs would be implemented including spill prevention and response measures to minimize any potential impacts from spills or leaks of oil from construction equipment.
§501.21 <i>Discharge of Municipal and Industrial Wastewater to Coastal Waters</i> Requires compliance with the Clean Water Act, 33 United States Code Annotated, §§1251 et seq, and its implementing regulations at Code of Federal Regulations, Title 40. Includes establishing surface water quality standards in order to protect designated uses of coastal waters, including the protection of uses for water supply, recreational purposes, and propagation and protection of terrestrial and aquatic life, and establishing water-quality-based effluent limits, including toxicity monitoring and specific toxicity or chemical limits as necessary to protect designated uses of coastal waters.	Not applicable	The Proposed Action would not result in discharges of municipal or industrial wastewater.
§501.22 <i>Nonpoint Source Water Pollution</i> Calls for the development and implementation of a coordinated program to reduce NPS pollution in order to restore and protect coastal waters. Requires that on-site disposal systems and underground storage tanks be located, designed, operated, inspected, and maintained so as to prevent releases of pollutants that may adversely affect coastal waters.	Consistent	The Proposed Action would not involve implementation of underground storage tanks, nor would the Proposed Action generate non-point source pollution to waters.
§501.23 <i>Development in Critical Areas</i> Regulates the dredging and construction of structures in, or the discharge of dredged or fill material into, critical areas. Provides framework for compensatory mitigation and includes restoring adversely affected critical areas or replacing adversely affected critical areas by creating new critical areas.	Not applicable	There would be no development or construction activities within critical areas. No dredging or filling would occur as a result of the Proposed Action.
§501.24 <i>Construction of Waterfront Facilities and Other Structures on Submerged Lands</i> Regulates the construction of waterfront facilities such as docks, marinas, piers, wharves, and artificial reefs on submerged lands of the state.	Not applicable	The Proposed Action would not involve construction of any waterfront facilities.
§501.25 <i>Dredging and Dredged Material and Placement</i> Provides policies for the dredging and disposal and placement of dredged material to	Not applicable	The Proposed Action would not involve dredging activities.

## Affected Environment and Environmental Consequences

Policy	Is the Proposed Action Consistent?	Evaluation of Consistency
avoid and otherwise minimize adverse effects to coastal waters, submerged lands, critical areas, coastal shore areas, and Gulf of Mexico beaches.		
§501.26 <i>Construction in the Beach/Dune System</i> Regulates the construction of facilities within the beach/dune system.	Not applicable	The Proposed Action would not involve the construction of facilities within the beach/dune system.
§501.27 <i>Development in Coastal Hazard Areas</i> Provides construction regulations and provisions for adopting ordinances for residential subdivisions participating in the National Flood Insurance Program. Also requires the Texas Government Land Office to adopt or issue rules, recommendations, standards, and guidelines for erosion avoidance and remediation and for prioritizing critical erosion areas.	Not applicable	The Proposed Action would not involve development or construction within any coastal hazard areas.
§501.28 <i>Development Within Coastal Barrier Resource System Units and Otherwise Protected Areas on Coastal Barriers</i> Provides policies for the development of new infrastructure or major repair of existing infrastructure within or supporting development within Coastal Barrier Resource System Units and Otherwise Protected Areas.	Consistent	Although the Proposed Action would be located on a coastal barrier island, it would not involve the development of any new infrastructure or construction within a designated coastal barrier resource system unit (USFWS, 2009), or otherwise protected areas on coastal barriers.
§501.29 <i>Development in State Parks, Wildlife Management Areas or Preserves</i> Provides that the development by a person other than the Texas Parks and Wildlife Department that requires the use or taking of any public land in such areas shall comply with Texas Parks and Wildlife Code, Chapter 26.	Not applicable	The Proposed Action would not involve any development within state lands.
§501.30 <i>Alteration of Coastal Historic Areas</i> Development affecting a coastal historic area shall avoid and otherwise minimize alteration or disturbance of the site unless the site's excavation will promote historical, archaeological, educational, or scientific understanding. Also requires the THC comply with the policies in this section when adopting rules and issuing permits under the Texas Natural Resources Code, Chapter 191, and governing alteration of coastal historic areas. The THC shall comply with the policies in this section when issuing reviews under the National Historic Preservation Act, §106 (16 United States Code Annotated, §470f).	Consistent	The Proposed Action is not likely to affect archaeological resources of the state; however, if effects to archaeological resources are anticipated, consultation with the applicable agencies, including the SHPO would be initiated as required by Section 106 of the NHPA and in accordance with Texas Administrative Code §501.30. No adverse visual effect to the 1923 Coast Guard Station Port Isabel Building, is anticipated; however, the Coast Guard has initiated Section 106 consultation with the Texas Historical Commission (THC) to discuss this resource.
§501.31 <i>Transportation Projects</i> Requires transportation projects located within the coastal zone to comply with specific policies pertaining to	Not applicable	The Proposed Action would not involve the construction of any transportation

## Affected Environment and Environmental Consequences

Policy	Is the Proposed Action Consistent?	Evaluation of Consistency
pollution prevention, minimization of development within wetland areas, and effects to recreational areas.		infrastructure.
§501.32 <i>Emission of Air Pollutants</i> Governs emissions of air pollutants, and requires compliance with regulations at Code of Federal Regulations, Title 40, adopted pursuant to the Clean Air Act, 42 United States Code Annotated, §§7401, et seq., to protect and enhance air quality in the coastal area so as to protect Coastal Natural Resource Areas and promote the public health, safety, and welfare.	Consistent	Operation of RFF South Padre Island under the Proposed Action would not adversely affect air quality; emissions during construction activities would be minor and would not result in adverse impacts.
§501.33 <i>Appropriations of Water</i> Provides policies for the impoundment and diversion of state water within 200 stream miles of the coast.	Not applicable	The Proposed Action would not require the diversion or impoundment of any state waters.
§501.34 <i>Levee and Flood Control Projects</i> Regulates the drainage, reclamation, channelization, levee construction or modification, or flood- or floodwater-control infrastructure of projects.	Not applicable	The Proposed Action would not involve drainage, reclamation, channelization, levee construction or modification, or flood- or floodwater-control infrastructure.

### 3.14.2 Coastal Barrier Resources

#### ***Affected Environment***

The Coastal Barrier Resources Act (CBRA), enacted in 1982, designated various undeveloped coastal barrier islands as units in the Coastal Barrier Resources System. Designated units are ineligible for direct and indirect Federal financial assistance programs that could support development on coastal barrier islands; exceptions are made for certain emergency and research activities. The project site is not included in the Coastal Barrier Resources System (USFWS, 2009b).

#### ***Environmental Consequences***

##### No Action

Under the No Action Alternative, no activity would occur on units in the Coastal Barrier Resource System.

##### Proposed Action

The project site is not located within the Coastal Barrier Resources System; therefore, the project would be in compliance with the CBRA.

### **3.15 ENVIRONMENTAL JUSTICE**

#### ***Affected Environment***

EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) requires Federal agencies to make achieving environmental justice part of their mission. Agencies are required to identify and correct programs, policies, and activities that have disproportionately high and adverse human health or environmental effects on minority and low-income populations. EO 12898 also tasks Federal agencies with ensuring that public notifications regarding environmental issues are concise, understandable, and readily accessible. Socioeconomic and demographic data for the project area was analyzed to determine whether a disproportionate number (greater than 50 percent) of minority or low-income persons have the potential to be adversely affected by the proposed project.

According to the U.S. Census 2000, in 1999 the median household income reported in Cameron County was \$29,589, with 34.3 percent of the population living below the poverty level. In the Town of South Padre Island, the median household income reported was \$45,417 with 12 percent of the population living below the poverty level. Based on the U.S. Census 2000, the concentration of minority persons within the Town of South Padre Island was reported to be 25 percent of the total population. As presented in Table 3-4, concentration of minority persons within the town is lower than the percentages of minority persons reported in Cameron County (85.5 percent) and the state of Texas (47.6 percent).

**Table 3-4: Population, Income, and Minority Demographics**

	<b>Texas</b>	<b>Cameron County</b>	<b>Town of South Padre Island</b>
Total population (1999)	24,326,974	392,736	2,422
Median household income (\$/yr)	\$47,563	\$29,589	\$45,417
Individuals below poverty level (%)	16.3	34.3	12
% minority population	47.6	85.5	25.0
Source: U.S. Census Bureau, 2000.			

#### ***Environmental Consequences***

##### No Action

Under the No Action Alternative, no activity would be performed and no disproportionately high or adverse impact on minority or low-income populations would occur.

##### Proposed Action

The Proposed Action would provide improved marine safety to all persons in the project area regardless of their income or minority status. No minority or low-income populations would be displaced or affected by the Proposed Action. Under the Proposed Action, no disproportionately high or adverse impacts to minority or low-income populations are anticipated. All persons regardless of race and income would benefit from the Proposed Action.

### 3.16 CUMULATIVE EFFECTS

In accordance with NEPA, this EA considers the overall cumulative impact of the Proposed Action and other actions that are related in terms of time or proximity. According to CEQ regulations, cumulative impacts represent the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time” (40 CFR 1508.7).

To address cumulative impacts, this section examines Coast Guard actions as well as non-Coast Guard actions occurring or proposed in the vicinity of the project area. The combined effects of these actions are evaluated to determine whether they could result in any cumulative impacts. It is expected that implementation of the Proposed Action would have an overall positive impact on human health and the environment as compared with the No Action alternative.

The Coast Guard is not proposing any major site work that, when combined with the Proposed Action, would have a cumulative effect on the human or natural environment. No major actions are anticipated in the vicinity of the project site because the project would occur within a previously disturbed industrial/commercial area. Areas surrounding the project site include a recreational vehicle park (Isla Blanca Park), a marina, the existing Coast Guard station, and commercial development, including hotels and condominiums; all of which have little to no room for additional development.

The construction of RFF South Padre Island, in combination with existing and potential future towers on South Padre Island, could result in cumulative impacts to migratory birds. At this time, the number of new towers that may be constructed is unknown, but future tower construction is expected to be constrained by local opposition to new towers and the limited availability of land. The cumulative impacts of communication towers on migratory birds are not well understood. The Coast Guard, in cooperation with the USFWS, is assisting in an avian research project at a Rescue 21 tower in Cape May, New Jersey, to help better understand these effects (Manville, 2009). Based on existing available data, towers less than 500 feet tall are believed to pose minimal threat to migrating birds (Woodlot, 2003). Since RFF South Padre Island would be below the 500-foot threshold, cumulative impacts to migratory birds associated with the Proposed Action are not expected to be significant.

The enforceable policies of the Texas Coastal Management Program were reviewed to determine whether the Proposed Action would result in any direct, indirect, or cumulative impacts. The Coast Guard has determined that the Proposed Action would not result in any cumulative impacts to resources within the Coastal Management Zone as regulated under the policies of the Texas CCC.



**SECTION FOUR      LIST OF PREPARERS**

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Lee-Ann Lyons, Senior Graphics Specialist

Ivy Porpotage, Senior Technical Editor

Thomas A. Tansey, USCG Environmental Program Manager, Rescue 21 Project Office





**SECTION FIVE****PERSONS AND AGENCIES CONSULTED****FEDERAL AGENCIES**

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Attn: Mary Orms  
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TAMU-CC Unit 5837  
6300 Ocean Dr.  
Corpus Christi, TX 78412

U.S. Army Corps of Engineers  
Corpus Christi Field Office  
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5151 Flynn Parkway, Suite 306  
Corpus Christi, TX 78411

Environmental Protection Agency, Region 6  
Attn: Mr. Lawrence Starfield, Acting Regional  
Administrator  
1445 Ross Avenue Suite 1200  
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U.S. Department of Agriculture  
Natural Resources Conservation Service  
San Benito Service Center  
Attn: Os Longoria, District Conservationist  
2315 W Hwy 83 RM 103  
San Benito, TX 78586-4666

National Park Service  
Padre Island National Seashore  
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Corpus Christi, TX 78480-1300

**STATE AGENCIES**

Texas Commission on Environmental Quality  
Region 15, Harlingen  
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Texas Commission on Environmental Quality  
Attn: Charles Maguire, Director  
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Texas Parks and Wildlife Department  
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Texas Historical Commission  
State Historic Preservation Office  
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Austin, TX 78711-2276

Texas Coastal Coordination Council  
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**LOCAL AGENCIES**

South Padre Island Mayor,  
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South Padre Island, TX 78597

South Padre Island City Manager,  
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Cameron County  
County Administrator  
Attn: Ms. Sofia Benavides  
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Brownsville, TX 78520

Cameron County  
Parks & Recreation Dept.  
Attn: Mr. Javier Mendez  
33174 State Park Rd. 100  
South Padre Island, TX 78597

Cameron County  
Sheriff's Department  
Attn: Sheriff Omar Lucio  
7300 Old Alice Road  
Olmito, TX 78575

Cameron County

## Persons and Agencies Consulted

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Historic Commission

Attn:

Mark Yates, Chair

2009 N. Parkwood Dr.

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Town of South Padre Island

Historical Preservation Committee

Attn: Mr. Steve Hathcock

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Town of South Padre Island

Development Plan & Review Board

Attn: Mr. Gardner Treharne

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Town of South Padre Island

Planning & Zoning Committee

Attn: Mr. Bob Fudge

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Town of South Padre Island

Police Department

Attn: Chief Robert Rodriguez

4601 Padre Blvd.

South Padre Island, TX 78597

Town of South Padre Island

Fire Department

Attn: Fire Chief Burney Baskett

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Cameron County

County Commissioner Pct. 1

Attn: Pete Sepulveda, Jr.

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Town of South Padre Island

Attn: Ms. Jo Ann Evans, Alderwoman

4601 Padre Blvd.

South Padre Island, TX 78597

Town of South Padre Island

Attn: Mr. Rick Ridolfi, Alderman

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Town of South Padre Island

Attn: Ms. Courtney Hayden, Alderwoman

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Attn: Ms. Alita Bagley, Alderwoman

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Town of South Padre Island

Attn: Mr. Sam Listi, Alderman

P.O. Box 2220

South Padre Island, TX 78597

The Honorable Kay Bailey Hutchison

1906 G East Tyler St.

Harlingen, TX 78550

The Honorable Blake Farenthold

1805 Ruben Torres Blvd., Suite B-27

Brownsville, TX 78521

The Honorable John Cornyn

222 East Van Buren St., Suite 404

Harlingen, TX 78550

The Honorable Solomon Ortiz

1805 Ruben Torres Blvd., Suite B-27

Brownsville, TX 78521

The Honorable Eddie Lucio, Jr.

7 North Park Plaza

Brownsville, TX 78521

The Honorable Tara Rios Ybarra

E2.302 Capitol Building

Austin, TX 78768-2910

The Nature Conservancy

Attn: Laura Huffman, State Director

P. O. Box 1440

San Antonio, TX 78295-1440

WBC Headquarters-Bentsen-Rio Grande Valley

State Park

Attn: George Cortez

## **Persons and Agencies Consulted**

---

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Mission, TX 78572

South Padre Island Chamber of Commerce  
Attn: Roxanne Guenzel, President  
600 Padre Blvd.  
South Padre Island, TX 78597

Port Isabel Public Library  
Attn: Caroline Barber, Director  
213 Yturria Rd  
Port Isabel, TX 78578

South Padre Island Birding Nature Center  
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6801 Padre Blvd.  
South Padre Island, TX 78597

### **OTHER ORGANIZATIONS/OFFICES**

The Nature Conservancy  
Attn: Ms. Laura Huffman, State Director  
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WBC Headquarters-Bentsen-Rio  
Grande Valley State Park  
Attn: Mr. George Cortez  
2800 S. Bentsen Palm Dr.  
Mission, TX 78572

South Padre Island Chamber of Commerce  
Attn: Ms. Roxanne Guenzel, President  
600 Padre Blvd.  
South Padre Island, TX 78597

### **PERSONS AND AGENCIES CONTACTED DURING PREPARATION OF THE 2002 SPEA:**

#### **FEDERAL AGENCIES:**

**Advisory Council on Historic Preservation**  
Washington, D.C.

**Environmental Protection Agency**  
Washington, D.C.  
Region 1  
Region 2  
Region 3  
Region 4  
Region 5  
Region 6  
Region 7  
Region 8  
Region 9  
Region 10

**National Oceanic and Atmospheric  
Administration (NOAA) National Marine  
Fisheries Service (NMFS)**  
Assistant Administrator for Fisheries (Silver  
Spring, MD)  
Alaska Regional Office  
Northeast Region  
Northwest Region  
Southeast Region  
Southwest Region

**Under Secretary of Commerce for Oceans and  
Atmosphere and NOAA Administrator**

#### **U.S. Coast Guard**

Washington D.C.  
11<sup>th</sup> CG District  
Maintenance and Logistics Command,  
Pacific

#### **U.S. Department of Agriculture**

Washington, D.C.  
Pacific Southwest Region  
Pacific Northwest Region  
Southern Region  
Eastern Region  
Alaska Region

#### **U.S. Department of Agriculture, Natural Resource Conservation Service**

Washington, D.C.

#### **U.S. Department of Interior, Bureau of Land Management (BLM)**

NEPA Environmental Coordinator  
(Arlington, VA)

#### **U.S. Department of Interior, Fish and Wildlife Service**

Region 1  
Region 2  
Region 3  
Region 4  
Region 5  
Region 7

#### **Department of Interior, Minerals Management Service**

Washington, D.C.

#### **Federal Aviation Administration, Airport Engineering and Design**

Washington, D.C.

#### **Federal Emergency Management Agency**

Washington, D.C.  
Region I  
Region II  
Region IV  
Region V  
Region VI  
Region IX  
Region X

#### **National Park Service**

Washington, D.C.  
National Capital Region  
Northeast Area Region  
Midwest Region  
Pacific West Region  
Southeast Region  
Intermountain Region

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## Persons and Agencies Consulted

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Alaska Area Region

**U.S. Army Corps of Engineers**

Washington, D.C.

North Atlantic Division

Atlantic Division

Mississippi Valley Division

Great Lakes and Ohio River Division

Southwestern Division

Northwestern Division

South Pacific Division

Pacific Ocean Division

**STATE AGENCIES**

**Alabama Historical Commission**

**California State Clearing House**

Office of Planning and Research

**District of Columbia**

Office of Partnerships and Grants  
Development

**Florida State Clearinghouse**

Department of Community Affairs

**Georgia State Clearinghouse**

**Iowa Department of Economic Development**

Division of Rural and Community  
Development

**Maine State Planning Office**

**Maryland Office of Planning**

**Mississippi Department of Finance and  
Administration**

Clearinghouse Officer

**Missouri Office of Administration**

Federal Assistance Clearinghouse

**New Hampshire Office of State Planning**

**North Carolina Department of Administration**

**Rhode Island Department of Administration**

Statewide Planning Program

**South Carolina Office of State Budget**

**State Historic Preservation Officers**

Alaska

California

Connecticut

Delaware

Florida

Georgia

Hawaii

Illinois

Indiana

Kentucky

Louisiana

Maine

Maryland

Massachusetts

Michigan

Minnesota

Mississippi

Missouri

New Hampshire

New Jersey

North Carolina

Ohio

Oregon

Pennsylvania

Rhode Island

South Carolina

Tennessee

Texas

Virginia

Washington, D.C.

West Virginia

Wisconsin

**Southeast Michigan Council of Governments**

**Texas Governor's Office of Budget and Planning**

**Wisconsin Department of Administration**

**OTHER**

**Coastal America**

**Confederated Tribes of Colville Reservation**

**Confederated Tribes of Warm Springs**

**Confederated Tribes of the Umatilla Reservation**

**Department of Commerce and Community  
Affairs, Chicago, IL**

**East Band of Cherokee Indians, Quallah  
Boundary**

**Guam Bureau of Budget and Management  
Research**

**Guam Historic Preservation Office**

**Lac Courte Oreilles Band of Lake Superior  
Chippewa**

**Lac du Flambeau**

**Leech Lake Band of Chippewa Indians**

**Lummi Tribe**

**The Makah Tribe**

Makah Cultural Research Center

**Maritime Institute of Technology**

**Menominee Indian Tribe of Wisconsin**

**Micronesia Department of Land**

**Micronesia Division of History and Cultural  
Preservation**

Historic Preservation Officer

**Micronesia Office of Management and Budget**

## **Persons and Agencies Consulted**

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**Micronesia Department of Community and Cultural Affairs**

**Mille Lacs Band of Ojibwe Indians**

**Narragansett Indian Tribe**

**Northwestern University**

Institute for Policy and Research

**Puerto Rico Office of Historic Preservation**

**Puerto Rico Planning Board**

**Republic of Marshall Islands, Majuro Atoll**

Interior and Outer Island Affairs

**Republic of Palau**

Ministry of Community and Cultural Affairs

**Red Cliff Band of Lake Superior Chippewa**

**Samoa Historic Preservation Officer**

**Samoa Office of Federal Programs, Office of the Governor**

**Seneca-Iroquois National Museum**

**Skokomish Indian Tribe**

**Spokane Tribe of Indians**

**Squaxin Island Tribe**

**States of Micronesia Historic Preservation Officer**

**Timbisha Shoshone Tribe**

**Tunica-Biloxi Indians of Louisiana**

**Virgin Islands Historic Preservation Office**

**Virgin Islands Office of Management and Budget**

**Wampanoag Tribe of Gay Head (Aquinnah)**

**Washington Tribal Historic Preservation Officer**

**SECTION SIX REFERENCES**

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**APPENDIX I**  
**AGENCY COORDINATION**





June 18, 2009

U.S. Fish and Wildlife Service  
Attn: Mary Orms  
Corpus Christi Ecological Services Field Office  
TAMU-CC Unit 5837  
6300 Ocean Dr.  
Corpus Christi, TX 78412

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Ms. Orms:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

The EA will examine two project alternatives: a No Action Alternative and a Proposed Action Alternative. Under the Proposed Action, the Coast Guard would construct a communications tower and associated equipment at the RFF South Padre Island site (Figure 1) located at 1 Wallace Reed Road, South Padre Island, Cameron County, Texas 78597 (26° 04' 25.8" N Latitude, -97° 09' 50.8" W Longitude). The proposed project site is located on Coast Guard-owned property at Station South Padre Island (Photos 1 and 2).

The project design would be similar to Coast Guard facilities at other sites, and would consist of a 400-foot tall, self-supported steel lattice communications tower with a direction-finding (DF) antenna mounted on the top (Figure 2). The addition of a DF antenna, mounting pole, and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The tower would be constructed prior to the installation of the Rescue 21 equipment. The Coast Guard is considering both painted and unpainted tower options. A painted tower would not require daytime lights, whereas an unpainted tower would require medium-intensity daytime lights in accordance with Federal Aviation Administration standards. The proposed tower would be enclosed by a new 75 by 75-foot fenced compound. In addition to the new communications tower, the compound would include a 12-foot by 28-foot elevated steel platform containing a prefabricated equipment shelter, an emergency backup generator, and one 500-gallon propane fuel tank, and a 2-foot by 4-foot-long ice bridge designed to support the transmission lines from the tower to the cable entry port (Figure 3).

June 18, 2009

Equipment would be staged during construction on existing paved surfaces or sparsely vegetated areas adjacent to the project site.

The project site lies at 5 feet above mean sea level and the surrounding areas are generally level. The project site is located on the southwestern end of South Padre Island, contains no structures, and consists of an open, previously disturbed industrial/commercial area. The Coast Guard dismantled a 305-foot tall guyed communications tower on this site in 2005. Areas surrounding the project site include a recreational vehicle park (Isla Blanca Park), a marina, the existing Coast Guard Station South Padre Island, and commercial development, including hotels and condominiums.

A wetlands delineation study was conducted in December 2008 and two separate wetland areas totaling 2.01 acres were delineated near the project site. The project site does not contain any navigable waters of the United States. The Coast Guard submitted a letter and wetlands delineation report to the U.S. Army Corps of Engineers requesting a jurisdictional determination. No response has been received to date. The proposed tower and compound would not be sited in wetlands although short utility access trenches would run through wetlands. Based on a site visit by an environmental scientist contracted to USCG, the project site does not contain ecologically critical or sensitive habitats or habitat suitable for any State or Federal protected species.

As the lead Federal agency, the Coast Guard is responsible for requesting your assistance and concurrence in our determination, in accordance with Section 7(a)(2) of the Endangered Species Act, that the Proposed Action is not likely to have an adverse effect on the continued existence of any endangered or threatened species or its critical habitat. The Coast Guard has determined that the construction of a 400-ft tall lattice communications tower and associated ground support equipment are not major construction activities in accordance with 50 CFR 402.02 and would not significantly affect the quality of the human environment. The Coast Guard understands that communication towers have been found to present a potential risk from collisions to migratory birds and has considered the U.S. Fish and Wildlife Service's "Interim Guidelines for Recommendations on Communications Tower Siting, Construction, Operation, and Decommissioning" to the maximum extent practicable.

Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Sincerely,



Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

June 18, 2009

Encl: Figure 1 - Site location map of RFF South Padre site  
Figure 2 - Proposed tower elevation drawing of the RFF South Padre site  
Figure 3 - Proposed site plan drawing of the RFF South Padre site  
Photographic Log – Photos 1 & 2 of proposed site







June 18, 2009

U.S. Army Corps of Engineers  
Corpus Christi Field Office  
Attn: Mr. Lloyd Mullins  
5151 Flynn Parkway, Suite 306  
Corpus Christi, TX 78411

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Mullins:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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The project design would be similar to Coast Guard facilities at other sites, and would consist of a 400-foot tall, self-supported steel lattice communications tower with a direction-finding (DF) antenna mounted on the top (Figure 2). The addition of a DF antenna, mounting pole, and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The tower would be constructed prior to the installation of the Rescue 21 equipment. The Coast Guard is considering both painted and unpainted tower options. A painted tower would not require daytime lights, whereas an unpainted tower would require medium-intensity daytime lights in accordance with Federal Aviation Administration standards. The proposed tower would be enclosed by a new 75 by 75-foot fenced compound. In addition to the new communications tower, the compound would include a 12-foot by 28-foot elevated steel platform containing a prefabricated equipment shelter, an emergency backup generator, and one 500-gallon propane fuel tank, and a 2-foot by 4-foot-long ice bridge designed to support the transmission lines from the tower to the cable entry port (Figure 3).

June 18, 2009

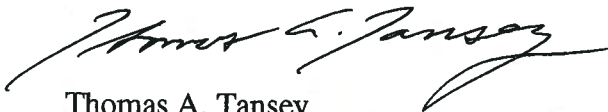
Equipment would be staged during construction on existing paved surfaces or sparsely vegetated areas adjacent to the project site.

The project site lies at 5 feet above mean sea level and the surrounding areas are generally level. The project site is located on the southwestern end of South Padre Island, contains no structures, and consists of an open, previously disturbed industrial/commercial area. The Coast Guard dismantled a 305-foot tall guyed communications tower on this site in 2005. Areas surrounding the project site include a recreational vehicle park (Isla Blanca Park), a marina, the existing Coast Guard Station South Padre Island, and commercial development, including hotels and condominiums. South Padre Island is one of many barrier islands located along the Gulf Coast, and is separated from the mainland by the Laguna Madre Bay. The project site is bordered on the north by Wallace Reed Road, which provides site access from the main north-south road on the island, Padre Boulevard, and is bordered on the east by an unnamed Coast Guard road. The project site shares a driveway (Wallace Reed Road) with the existing Coast Guard station.

A wetlands delineation study was conducted in December 2008 and two separate wetland areas totaling 2.01 acres were delineated near the project site. The project site does not contain any navigable waters of the United States. On April 24, 2009, our office submitted a letter and wetlands delineation report to the U.S. Army Corps of Engineers requesting a jurisdictional determination. A postcard receipt has been received to date. The proposed tower and compound would not be sited in wetlands although short utility access trenches would run through wetlands. Based on a site visit by an environmental scientist contracted to USCG, the project site does not contain ecologically critical or sensitive habitats or habitat suitable for any State or Federal protected species.

As the lead Federal agency, the Coast Guard is requesting that your agency review the Proposed Action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to Ms. Sherrill Edwards-Owens at the letterhead address. If you have any questions or require additional assistance, please contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Sincerely,



Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

Encl: Figure 1 - Site location map of RFF South Padre site  
Figure 2 - Proposed tower elevation drawing of the RFF South Padre site  
Figure 3 - Proposed site plan drawing of the RFF South Padre site  
Photographic Log – Photos 1 & 2 of proposed site



June 18, 2009

Environmental Protection Agency, Region 6  
Attn: Mr. Lawrence Starfield, Acting Regional Administrator  
1445 Ross Avenue Suite 1200  
Dallas, TX 75202

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Starfield:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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The project design would be similar to Coast Guard facilities at other sites, and would consist of a 400-foot tall, self-supported steel lattice communications tower with a direction-finding (DF) antenna mounted on the top (Figure 2). The addition of a DF antenna, mounting pole, and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The tower would be constructed prior to the installation of the Rescue 21 equipment. The Coast Guard is considering both painted and unpainted tower options. A painted tower would not require daytime lights, whereas an unpainted tower would require medium-intensity daytime lights in accordance with Federal Aviation Administration standards. The proposed tower would be enclosed by a new 75 by 75-foot fenced compound. In addition to the new communications tower, the compound would include a 12-foot by 28-foot elevated steel platform containing a prefabricated equipment shelter, an emergency backup generator, and one 500-gallon propane fuel tank, and a 2-foot by 4-foot-long ice bridge designed to support the transmission lines from the tower to the cable entry port (Figure 3). Equipment would be staged during construction on existing paved surfaces or sparsely vegetated areas adjacent to the project site.

June 18, 2009

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As the lead Federal agency, the Coast Guard is requesting that your agency review the Proposed Action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Sincerely,



Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

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Photographic Log – Photos 1 & 2 of proposed site



June 18, 2009

U.S. Department of Agriculture  
Natural Resources Conservation Service  
San Benito Service Center  
Attn: Os Longoria, District Conservationist  
2315 W Hwy 83 RM 103  
San Benito, TX 78586-4666

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Longoria:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 18, 2009


Equipment would be staged during construction on existing paved surfaces or sparsely vegetated areas adjacent to the project site.

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A wetlands delineation study was conducted in December 2008 and two separate wetland areas totaling 2.01 acres were delineated near the project site. The project site does not contain any navigable waters of the United States. The Coast Guard submitted a letter and wetlands delineation report to the U.S. Army Corps of Engineers requesting a jurisdictional determination. No response has been received to date. The proposed tower and compound would not be sited in wetlands although short utility access trenches would run through wetlands. Based on a site visit by an environmental scientist contracted to USCG, the project site does not contain ecologically critical or sensitive habitats or habitat suitable for any State or Federal protected species.

As the lead Federal agency, the Coast Guard is requesting that your agency review the Proposed Action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Sincerely,

  
Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

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Photographic Log – Photos 1 & 2 of proposed site





June 18, 2009

National Park Service  
Padre Island National Seashore  
Attn: Superintendent Joe Escoto  
PO Box 181300  
Corpus Christi, TX 78480-1300

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Superintendent Escoto:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

The EA will examine two project alternatives: a No Action Alternative and a Proposed Action Alternative. Under the Proposed Action, the Coast Guard would construct a communications tower and associated equipment at the RFF South Padre Island site (Figure 1) located at 1 Wallace Reed Road, South Padre Island, Cameron County, Texas 78597 (26° 04' 25.8" N Latitude, -97° 09' 50.8" W Longitude). The proposed project site is located on Coast Guard-owned property at Station South Padre Island (Photos 1 and 2).

The project design would be similar to Coast Guard facilities at other sites, and would consist of a 400-foot tall, self-supported steel lattice communications tower with a direction-finding (DF) antenna mounted on the top (Figure 2). The addition of a DF antenna, mounting pole, and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The tower would be constructed prior to the installation of the Rescue 21 equipment. The Coast Guard is considering both painted and unpainted tower options. A painted tower would not require daytime lights, whereas an unpainted tower would require medium-intensity daytime lights in accordance with Federal Aviation Administration standards. The proposed tower would be enclosed by a new 75 by 75-foot fenced compound. In addition to the new communications tower, the compound would include a 12-foot by 28-foot elevated steel platform containing a prefabricated equipment shelter, an emergency backup generator, and one 500-gallon propane fuel tank, and a 2-foot by 4-foot-long ice bridge designed to support the transmission lines from the tower to the cable entry port (Figure 3).

June 18, 2009

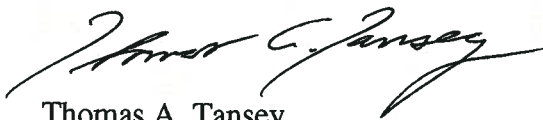
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June 18, 2009

Texas Commission on Environmental Quality  
Region 15, Harlingen  
Attn: Mr. David Ramirez  
1804 West Jefferson Ave.  
Harlingen, TX 78550-5247

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Ramirez:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 18, 2009

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June 18, 2009

Texas Commission on Environmental Quality  
Water Quality Division  
Attn: L'Oreal Stepney, Director  
12100 Park 35 Circle  
Building S MC148  
Austin, TX 78753

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Director Stepney:

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June 18, 2009

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June 18, 2009

Texas Parks and Wildlife Department  
Attn: Mr. Clay Brewer, Acting Director for Natural Resources  
4200 Smith School Road  
Austin, TX 78744

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Brewer:

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June 18, 2009

Texas Coastal Coordination Council  
Attn: Jody Henneke, Deputy Commissioner  
P.O. Box 12873  
Austin, TX 78711-2873

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Commissioner Henneke:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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As the lead Federal agency, the Coast Guard is requesting that your agency review the Proposed Action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Although Federal lands are excluded from the Texas Coastal Management Program (CMP) under 15 CFR 923.33, any activity on Federal lands that has reasonably foreseeable coastal effects must be consistent with the Texas CMP. Because construction of RFF South Padre Island has potential coastal zone spillover effects, the Coast Guard is required to evaluate the Proposed Action relative to the Texas CMP.

After review of the Texas CMP and enforceable policies of your management program, the Coast Guard has made a Negative Determination that the installation of the proposed tower and ground support equipment on Federal land is an action which will not affect any coastal use or resource in the State of Texas coastal zone as per the State of Texas CMP, the Coastal Zone Management Act of 1972 (as amended through P.L. 104-105), and 15 CFR 930.35.



June 18, 2009

Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas A. Tansey", with a stylized flourish at the end.

Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

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Table 1 - Texas Coastal Management Program Consistency Evaluation

**Table 1: Texas Coastal Management Program Consistency Evaluation – Policies of Texas Administrative Code Title 31, Part 16, Chapter 501, Subsection B**

<b>Policy</b>	<b>Is the Proposed Action Consistent?</b>	<b>Evaluation of Consistency</b>
§501.13 <i>Administrative Policies</i> Provides directives for agency and subdivision rules and ordinances subject to the TCMP goals and policies, as provided in 31 TAC 501.10 (relating to Compliance with Goals and Policies).	Consistent	The Proposed Action is a federal agency action.
§501.15 <i>Policy for Major Actions</i> States that, prior to taking a major action, the agencies and subdivisions having jurisdiction over the activity shall meet and coordinate their major actions relating to the activity. No agency or subdivision shall take a major action that is inconsistent with the goals and policies of the chapter.	Consistent	The Proposed Action is a federal agency action and is consistent to the maximum extent practicable with the goals and policies of this chapter. This draft EA provides the Texas CCC the opportunity to review and comment on the Proposed Action.
§501.16 <i>Construction of Electric Generating and Transmission Facilities</i> Regulates the construction of electric generating facilities and electric transmission lines in the coastal zone.	Not applicable	The Proposed Action would not involve the construction of any electric generating or electric transmission lines.
§501.17 <i>Construction, Operation, and Maintenance of Oil and Gas Exploration and Production Facilities</i> Regulates oil and gas exploration and production on submerged lands.	Not applicable	The Proposed Action would not involve the construction or operation of oil and gas facilities or involve any exploration for oil and gas.
§501.18 <i>Discharges of Wastewater and Disposal of Waste from Oil and Gas Exploration and Production Activities</i> Regulates the disposal of oil and gas waste in the coastal zone and the discharge of oil and gas exploration and production wastewater in the coastal zone.	Not applicable	The Proposed Action would not involve the discharge of any oil and gas wastewater.
§501.19 <i>Construction and Operation of Solid Waste Treatment, Storage, and Disposal Facilities</i> Regulates the construction and operation of new and existing solid waste facilities and hazardous waste facilities located within the coastal zone.	Consistent	The Proposed Action would not involve construction or operation of solid waste facilities. No hazardous waste would be placed within the coastal zone. All solid and hazardous waste generated during Proposed Action activities would be disposed of in accordance with State and local regulations and would not affect the state of Texas's Coastal Natural Resource Areas.
§501.20 <i>Prevention, Response, and Remediation of Spills</i> Governs the prevention of, response to and remediation of coastal oil spills and provides for measures to prevent coastal oil spills and to ensure adequate response and removal actions. Also governs the assessment of damages to natural resources injured as the result of an unauthorized discharge of oil into coastal waters.	Consistent	The Proposed Action would not involve the discharge of oil. Construction BMPs would be implemented including spill prevention and response measures to minimize any potential impacts from spills or leaks of oil from construction equipment.

Policy	Is the Proposed Action Consistent?	Evaluation of Consistency
<p>§501.21 <i>Discharge of Municipal and Industrial Wastewater to Coastal Waters</i> Requires compliance with the Clean Water Act, 33 United States Code Annotated, §§1251 et seq, and its implementing regulations at Code of Federal Regulations, Title 40. Includes establishing surface water quality standards in order to protect designated uses of coastal waters, including the protection of uses for water supply, recreational purposes, and propagation and protection of terrestrial and aquatic life, and establishing water-quality-based effluent limits, including toxicity monitoring and specific toxicity or chemical limits as necessary to protect designated uses of coastal waters.</p>	Not applicable	The Proposed Action would not result in discharges of municipal or industrial wastewater.
<p>§501.22 <i>Nonpoint Source Water Pollution</i> Calls for the development and implementation of a coordinated program to reduce NPS pollution in order to restore and protect coastal waters. Requires that on-site disposal systems and underground storage tanks be located, designed, operated, inspected, and maintained so as to prevent releases of pollutants that may adversely affect coastal waters.</p>	Consistent	The Proposed Action would not involve implementation of underground storage tanks, nor would the Proposed Action generate non-point source pollution to waters.
<p>§501.23 <i>Development in Critical Areas</i> Regulates the dredging and construction of structures in, or the discharge of dredged or fill material into, critical areas. Provides framework for compensatory mitigation and includes restoring adversely affected critical areas or replacing adversely affected critical areas by creating new critical areas.</p>	Not applicable	There would be no development or construction activities within critical areas. No dredging or filling would occur as a result of the Proposed Action.
<p>§501.24 <i>Construction of Waterfront Facilities and Other Structures on Submerged Lands</i> Regulates the construction of waterfront facilities such as docks, marinas, piers, wharves, and artificial reefs on submerged lands of the state.</p>	Not applicable	The Proposed Action would not involve construction of any waterfront facilities.
<p>§501.25 <i>Dredging and Dredged Material and Placement</i> Provides policies for the dredging and disposal and placement of dredged material to avoid and otherwise minimize adverse effects to coastal waters, submerged lands, critical areas, coastal shore areas, and Gulf of Mexico beaches.</p>	Not applicable	The Proposed Action would not involve dredging activities.
<p>§501.26 <i>Construction in the Beach/Dune System</i> Regulates the construction of facilities within the beach/dune system.</p>	Not applicable	The Proposed Action would not involve the construction of facilities within the beach/dune system.
<p>§501.27 <i>Development in Coastal Hazard Areas</i> Provides construction regulations and provisions</p>	Not applicable	The Proposed Action would not involve development or construction within any

Policy	Is the Proposed Action Consistent?	Evaluation of Consistency
for adopting ordinances for residential subdivisions participating in the National Flood Insurance Program. Also requires the Texas Government Land Office to adopt or issue rules, recommendations, standards, and guidelines for erosion avoidance and remediation and for prioritizing critical erosion areas.		coastal hazard areas.
§501.28 <i>Development Within Coastal Barrier Resource System Units and Otherwise Protected Areas on Coastal Barriers</i> Provides policies for the development of new infrastructure or major repair of existing infrastructure within or supporting development within Coastal Barrier Resource System Units and Otherwise Protected Areas.	Consistent	Although the Proposed Action would be located on a coastal barrier island, it would not involve the development of any new infrastructure or construction within a designated coastal barrier resource system unit (USFWS, 2009), or otherwise protected areas on coastal barriers.
§501.29 <i>Development in State Parks, Wildlife Management Areas or Preserves</i> Provides that the development by a person other than the Texas Parks and Wildlife Department that requires the use or taking of any public land in such areas shall comply with Texas Parks and Wildlife Code, Chapter 26.	Not applicable	The Proposed Action would not involve any development within state lands.
§501.30 <i>Alteration of Coastal Historic Areas</i> Development affecting a coastal historic area shall avoid and otherwise minimize alteration or disturbance of the site unless the site's excavation will promote historical, archaeological, educational, or scientific understanding. Also requires the THC comply with the policies in this section when adopting rules and issuing permits under the Texas Natural Resources Code, Chapter 191, and governing alteration of coastal historic areas. The THC shall comply with the policies in this section when issuing reviews under the National Historic Preservation Act, §106 (16 United States Code Annotated, §470f).	Consistent	The Proposed Action is not likely to affect archaeological resources of the state; however, if effects to archaeological resources are anticipated, consultation with the applicable agencies, including the SHPO would be initiated as required by Section 106 of the NHPA and in accordance with Texas Administrative Code §501.30. Adverse visual effects to one aboveground historic property, the 1923 Coast Guard Station Port Isabel Building, and one underwater archaeological site, the 1879 Brazos Santiago Light, are anticipated. The Coast Guard has initiated Section 106 consultation with the Texas Historical Commission (THC) regarding the effects to this resource.
§501.31 <i>Transportation Projects</i> Requires transportation projects located within the coastal zone to comply with specific policies pertaining to pollution prevention, minimization of development within wetland areas, and effects to recreational areas.	Not applicable	The Proposed Action would not involve the construction of any transportation infrastructure.
§501.32 <i>Emission of Air Pollutants</i> Governs emissions of air pollutants, and requires	Consistent	Operation of RFF South Padre Island under the Proposed Action would not

Policy	Is the Proposed Action Consistent?	Evaluation of Consistency
compliance with regulations at Code of Federal Regulations, Title 40, adopted pursuant to the Clean Air Act, 42 United States Code Annotated, §§7401, et seq, to protect and enhance air quality in the coastal area so as to protect Coastal Natural Resource Areas and promote the public health, safety, and welfare.		adversely affect air quality; emissions during construction activities would be minor and would not result in adverse impacts.
§501.33 <i>Appropriations of Water</i> Provides policies for the impoundment and diversion of state water within 200 stream miles of the coast.	Not applicable	The Proposed Action would not require the diversion or impoundment of any state waters.
§501.34 <i>Levee and Flood Control Projects</i> Regulates the drainage, reclamation, channelization, levee construction or modification, or flood- or floodwater-control infrastructure of projects.	Not applicable	The Proposed Action would not involve drainage, reclamation, channelization, levee construction or modification, or flood- or floodwater-control infrastructure.





June 18, 2009

Cameron County  
County Administrator  
Attn: Mr. Pete Sepulveda, Jr.  
1100 E. Monroe St.  
Brownsville, TX 78520

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Sepulveda, Jr.:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

The EA will examine two project alternatives: a No Action Alternative and a Proposed Action Alternative. Under the Proposed Action, the Coast Guard would construct a communications tower and associated equipment at the RFF South Padre Island site (Figure 1) located at 1 Wallace Reed Road, South Padre Island, Cameron County, Texas 78597 (26° 04' 25.8" N Latitude, -97° 09' 50.8" W Longitude). The proposed project site is located on Coast Guard-owned property at Station South Padre Island (Photos 1 and 2).

The project design would be similar to Coast Guard facilities at other sites, and would consist of a 400-foot tall, self-supported steel lattice communications tower with a direction-finding (DF) antenna mounted on the top (Figure 2). The addition of a DF antenna, mounting pole, and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The tower would be constructed prior to the installation of the Rescue 21 equipment. The Coast Guard is considering both painted and unpainted tower options. A painted tower would not require daytime lights, whereas an unpainted tower would require medium-intensity daytime lights in accordance with Federal Aviation Administration standards. The proposed tower would be enclosed by a new 75 by 75-foot fenced compound. In addition to the new communications tower, the compound would include a 12-foot by 28-foot elevated steel platform containing a prefabricated equipment shelter, an emergency backup generator, and one 500-gallon propane fuel tank, and a 2-foot by 4-foot-long ice bridge designed to support the transmission lines from the tower to the cable entry port (Figure 3).

June 18, 2009

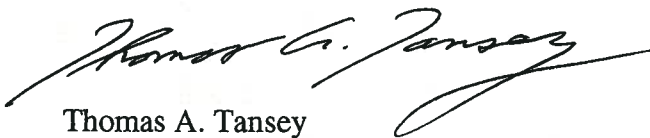
Equipment would be staged during construction on existing paved surfaces or sparsely vegetated areas adjacent to the project site.

The project site lies at 5 feet above mean sea level and the surrounding areas are generally level. The project site is located on the southwestern end of South Padre Island, contains no structures, and consists of an open, previously disturbed industrial/commercial area. The Coast Guard dismantled a 305-foot tall guyed communications tower on this site in 2005. Areas surrounding the project site include a recreational vehicle park (Isla Blanca Park), a marina, the existing Coast Guard Station South Padre Island, and commercial development, including hotels and condominiums. South Padre Island is one of many barrier islands located along the Gulf Coast, and is separated from the mainland by the Laguna Madre Bay. The project site is bordered on the north by Wallace Reed Road, which provides site access from the main north-south road on the island, Padre Boulevard, and is bordered on the east by an unnamed Coast Guard road. The project site shares a driveway (Wallace Reed Road) with the existing Coast Guard station.

A wetlands delineation study was conducted in December 2008 and two separate wetland areas totaling 2.01 acres were delineated near the project site. The project site does not contain any navigable waters of the United States. The Coast Guard submitted a letter and wetlands delineation report to the U.S. Army Corps of Engineers requesting a jurisdictional determination. No response has been received to date. The proposed tower and compound would not be sited in wetlands although short utility access trenches would run through wetlands. Based on a site visit by an environmental scientist contracted to USCG, the project site does not contain ecologically critical or sensitive habitats or habitat suitable for any State or Federal protected species.

As the lead Federal agency, the Coast Guard is requesting that your agency review the Proposed Action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Sincerely,



Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

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Photographic Log – Photos 1 & 2 of proposed site





June 18, 2009

Cameron County  
Parks & Recreation Dept.  
Attn: Mr. Javier Mendez  
33174 State Park Rd. 100  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Mendez:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 18, 2009

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U.S. Department of  
Homeland Security

United States  
Coast Guard



COMMANDANT (CG-9331)  
ATTN: Thomas A. Tansey  
US COAST GUARD

2100 2ND ST SW STOP 7701  
WASHINGTON DC 20593-7701

Phone: (202) 475-3293  
FAX: (202) 475-3916

June 18, 2009

Cameron County  
Sheriff's Department  
Attn: Sheriff Omar Lucio  
7300 Old Alice Road  
Olmito, TX 78575

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Sheriff Lucio:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 18, 2009

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June 18, 2009

Cameron County  
Historic Commission  
Attn: Ms. Mary Torres  
2009 N. Parkwood Dr.  
Harlingen, TX 78550-8020

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Ms. Torres:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 18, 2009

Town of South Padre Island  
Historical Preservation Committee  
Attn: Mr. Steve Hathcock  
104 West Pompano St.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Hathcock:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 18, 2009

Town of South Padre Island  
Development Plan & Review Board  
Attn: Mr. Gardner Treharne  
P.O. Box 2354  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Treharne:

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Figure 3 - Proposed site plan drawing of the RFF South Padre site  
Photographic Log – Photos 1 & 2 of proposed site



June 18, 2009

Town of South Padre Island  
Planning & Zoning Committee  
Attn: Mr. Bob Fudge  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Fudge:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

The EA will examine two project alternatives: a No Action Alternative and a Proposed Action Alternative. Under the Proposed Action, the Coast Guard would construct a communications tower and associated equipment at the RFF South Padre Island site (Figure 1) located at 1 Wallace Reed Road, South Padre Island, Cameron County, Texas 78597 (26° 04' 25.8" N Latitude, -97° 09' 50.8" W Longitude). The proposed project site is located on Coast Guard-owned property at Station South Padre Island (Photos 1 and 2).

The project design would be similar to Coast Guard facilities at other sites, and would consist of a 400-foot tall, self-supported steel lattice communications tower with a direction-finding (DF) antenna mounted on the top (Figure 2). The addition of a DF antenna, mounting pole, and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The tower would be constructed prior to the installation of the Rescue 21 equipment. The Coast Guard is considering both painted and unpainted tower options. A painted tower would not require daytime lights, whereas an unpainted tower would require medium-intensity daytime lights in accordance with Federal Aviation Administration standards. The proposed tower would be enclosed by a new 75 by 75-foot fenced compound. In addition to the new communications tower, the compound would include a 12-foot by 28-foot elevated steel platform containing a prefabricated equipment shelter, an emergency backup generator, and one 500-gallon propane fuel tank, and a 2-foot by 4-foot-long ice bridge designed to support the transmission lines from the tower to the cable entry port (Figure 3).

June 18, 2009

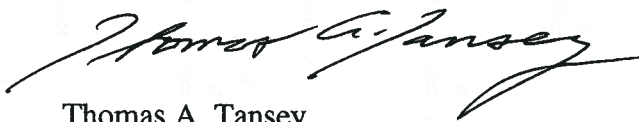
Equipment would be staged during construction on existing paved surfaces or sparsely vegetated areas adjacent to the project site.

The project site lies at 5 feet above mean sea level and the surrounding areas are generally level. The project site is located on the southwestern end of South Padre Island, contains no structures, and consists of an open, previously disturbed industrial/commercial area. The Coast Guard dismantled a 305-foot tall guyed communications tower on this site in 2005. Areas surrounding the project site include a recreational vehicle park (Isla Blanca Park), a marina, the existing Coast Guard Station South Padre Island, and commercial development, including hotels and condominiums. South Padre Island is one of many barrier islands located along the Gulf Coast, and is separated from the mainland by the Laguna Madre Bay. The project site is bordered on the north by Wallace Reed Road, which provides site access from the main north-south road on the island, Padre Boulevard, and is bordered on the east by an unnamed Coast Guard road. The project site shares a driveway (Wallace Reed Road) with the existing Coast Guard station.

A wetlands delineation study was conducted in December 2008 and two separate wetland areas totaling 2.01 acres were delineated near the project site. The project site does not contain any navigable waters of the United States. The Coast Guard submitted a letter and wetlands delineation report to the U.S. Army Corps of Engineers requesting a jurisdictional determination. No response has been received to date. The proposed tower and compound would not be sited in wetlands although short utility access trenches would run through wetlands. Based on a site visit by an environmental scientist contracted to USCG, the project site does not contain ecologically critical or sensitive habitats or habitat suitable for any State or Federal protected species.

As the lead Federal agency, the Coast Guard is requesting that your agency review the Proposed Action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Sincerely,



Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

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June 18, 2009

Town of South Padre Island  
Police Department  
Attn: Chief Robert Rodriguez  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Chief Rodriguez:

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June 18, 2009

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June 18, 2009

Town of South Padre Island  
Fire Department  
Attn: Fire Chief Burney Baskett  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Fire Chief Baskett:

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June 18, 2009

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June 18, 2009

Cameron County  
County Commissioner Pct. 1  
Attn: Ms. Sofia Benavides  
1100 E. Monroe St.  
Brownsville, TX 78520

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Commissioner Benavides:

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June 18, 2009

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June 19, 2009

Town of South Padre Island  
Attn: Mayor Robert Pinkerton, Jr.  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported  
Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mayor Pinkerton, Jr:

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June 19, 2009

Town of South Padre Island  
Attn: Mr. Dewey Cashwell, Jr., City Manager  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Cashwell, Jr.:

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June 19, 2009

Town of South Padre Island  
Attn: Ms. Jo Ann Evans, Alderwoman  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Alderwoman Evans:

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A wetlands delineation study was conducted in December 2008 and two separate wetland areas totaling 2.01 acres were delineated near the project site. The project site does not contain any navigable waters of the United States. The Coast Guard submitted a letter and wetlands delineation report to the U.S. Army Corps of Engineers requesting a jurisdictional determination. No response has been received to date. The proposed tower and compound would not be sited in wetlands although short utility access trenches would run through wetlands. Based on a site visit by an environmental scientist contracted to USCG, the project site does not contain ecologically critical or sensitive habitats or habitat suitable for any State or Federal protected species.

As the lead Federal agency, the Coast Guard is requesting that your office review the Proposed Action and provide comments and any available information on resources under your office's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Sincerely,



Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

Encl: Figure 1 - Site location map of RFF South Padre site  
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June 19, 2009

Town of South Padre Island  
Attn: Mr. Rick Ridolfi, Alderman  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Alderman Ridolfi:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

The EA will examine two project alternatives: a No Action Alternative and a Proposed Action Alternative. Under the Proposed Action, the Coast Guard would construct a communications tower and associated equipment at the RFF South Padre Island site (Figure 1) located at 1 Wallace Reed Road, South Padre Island, Cameron County, Texas 78597 (26° 04' 25.8" N Latitude, -97° 09' 50.8" W Longitude). The proposed project site is located on Coast Guard-owned property at Station South Padre Island (Photos 1 and 2).

The project design would be similar to Coast Guard facilities at other sites, and would consist of a 400-foot tall, self-supported steel lattice communications tower with a direction-finding (DF) antenna mounted on the top (Figure 2). The addition of a DF antenna, mounting pole, and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The tower would be constructed prior to the installation of the Rescue 21 equipment. The Coast Guard is considering both painted and unpainted tower options. A painted tower would not require daytime lights, whereas an unpainted tower would require medium-intensity daytime lights in accordance with Federal Aviation Administration standards. The proposed tower would be enclosed by a new 75 by 75-foot fenced compound. In addition to the new communications tower, the compound would include a 12-foot by 28-foot elevated steel platform containing a prefabricated equipment shelter, an emergency backup generator, and one 500-gallon propane fuel tank, and a 2-foot by 4-foot-long ice bridge designed to support the transmission lines from the tower to the cable entry port (Figure 3).

June 19, 2009

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June 19, 2009

Town of South Padre Island  
Attn: Ms. Courtney Hayden, Alderwoman  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Alderwoman Hayden:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 19, 2009

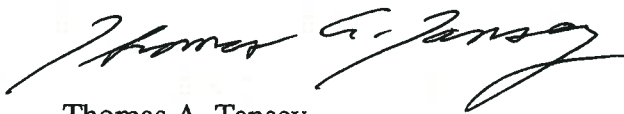
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June 18, 2009

Town of South Padre Island  
Attn: Ms. Alita Bagley, Alderwoman  
4601 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Alderwoman Bagley:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 18, 2009

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June 19, 2009

Town of South Padre Island  
Attn: Mr. Sam Listi, Alderman  
P.O. Box 2220  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Alderman Listi:

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June 19, 2009

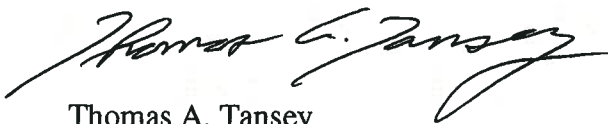
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June 19, 2009

The Honorable Kay Bailey Hutchison  
1906 G East Tyler St.  
Harlingen, TX 78550

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported  
Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Senator Hutchison:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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As the lead Federal agency, the Coast Guard is requesting that your office review the Proposed Action and provide comments no later than 5:00 PM on July 6, 2009. Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please have a member of your staff contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Very Respectfully,



Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

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June 19, 2009

The Honorable John Cornyn  
222 East Van Buren St., Suite 404  
Harlingen, TX 78550

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported  
Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Senator Cornyn:

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June 19, 2009

The Honorable Solomon Ortiz  
1805 Ruben Torres Blvd., Suite B-27  
Brownsville, TX 78521

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported  
Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Representative Ortiz:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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The project design would be similar to Coast Guard facilities at other sites, and would consist of a 400-foot tall, self-supported steel lattice communications tower with a direction-finding (DF) antenna mounted on the top (Figure 2). The addition of a DF antenna, mounting pole, and lightning rod would increase the total height of the tower and added appurtenances to approximately 413 feet above ground level. The tower would be constructed prior to the installation of the Rescue 21 equipment. The Coast Guard is considering both painted and unpainted tower options. A painted tower would not require daytime lights, whereas an unpainted tower would require medium-intensity daytime lights in accordance with Federal Aviation Administration standards. The proposed tower would be enclosed by a new 75 by 75-foot fenced compound. In addition to the new communications tower, the compound would include a 12-foot by 28-foot elevated steel platform containing a prefabricated equipment shelter, an emergency backup generator, and one 500-gallon propane fuel tank, and a 2-foot by 4-foot-long ice bridge designed to support the transmission lines from the tower to the cable entry port (Figure 3). Equipment would be staged during construction on existing paved surfaces or sparsely vegetated areas adjacent to the project site.

June 19, 2009

The project site lies at 5 feet above mean sea level and the surrounding areas are generally level. The project site is located on the southwestern end of South Padre Island, contains no structures, and consists of an open, previously disturbed industrial/commercial area. The Coast Guard dismantled a 305-foot tall guyed communications tower on this site in 2005. Areas surrounding the project site include a recreational vehicle park (Isla Blanca Park), a marina, the existing Coast Guard Station South Padre Island, and commercial development, including hotels and condominiums. South Padre Island is one of many barrier islands located along the Gulf Coast, and is separated from the mainland by the Laguna Madre Bay. The project site is bordered on the north by Wallace Reed Road, which provides site access from the main north-south road on the island, Padre Boulevard, and is bordered on the east by an unnamed Coast Guard road. The project site shares a driveway (Wallace Reed Road) with the existing Coast Guard station.

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As the lead Federal agency, the Coast Guard is requesting that your office review the Proposed Action and provide comments no later than 5:00 PM on July 6, 2009. Please direct comments and information directly to me at the letterhead address. If you have any questions or require additional assistance, please have a member of your staff contact me at (202) 475-3293 or [Thomas.A.Tansey@uscg.mil](mailto:Thomas.A.Tansey@uscg.mil).

Very Respectfully,



Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office

Encl: Figure 1 - Site location map of RFF South Padre site  
Figure 2 - Proposed tower elevation drawing of the RFF South Padre site  
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Photographic Log - Photos 1 & 2 of proposed site



June 19, 2009

The Honorable Eddie Lucio, Jr.  
7 North Park Plaza  
Brownsville, TX 78521

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Senator Lucio, Jr.:

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Thomas A. Tansey  
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June 19, 2009

The Honorable Tara Rios Ybarra  
E2.302 Capitol Building  
Austin, TX 78768-2910

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Representative Yabarra:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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June 19, 2009

The Nature Conservancy  
Attn: Ms. Laura Huffman, State Director  
P.O. Box 1440  
San Antonio, TX 78295-1440

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Ms. Huffman:

The U.S. Coast Guard (Coast Guard) is preparing an Environmental Assessment (EA) for the proposed construction of a 400-foot tall, self-supported communications tower and associated equipment as part of the Coast Guard's Rescue 21 program. The Rescue 21 program is the maritime equivalent to a "911" communications system, enhancing maritime safety by helping to minimize the time that search and rescue teams spend looking for people in distress. The new communication equipment would fill in existing coverage gaps in the existing VHF-FM marine communication system used for Coast Guard operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and homeland security.

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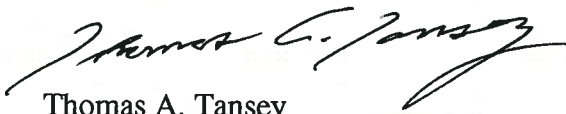
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Environmental Program Manager  
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June 19, 2009

WBC Headquarters-Bentsen-Rio  
Grande Valley State Park  
Attn: Mr. George Cortez  
2800 S. Bentsen Palm Dr.  
Mission, TX 78572

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported  
Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Cortez:

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June 19, 2009

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June 19, 2009

South Padre Island Chamber of Commerce  
Attn: Ms. Roxanne Guenzel, President  
600 Padre Blvd.  
South Padre Island, TX 78597

**RE: Request for Project Review - Construction of a 400-foot Tall Self-Supported  
Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Ms. Guenzel:

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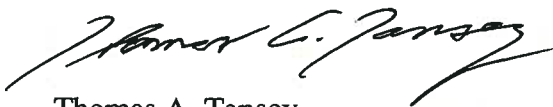
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TOWN OF



PLANNING DEPARTMENT  
4601 PADRE BOULEVARD • SOUTH PADRE ISLAND, TEXAS 78597  
PHONE: (956) 761-1025 – FAX (956) 761-3898

July 17, 2009

Thomas A. Tansey  
Environmental Program Manager  
Recue 21 Project Office  
US Coast Guard  
2100 2<sup>ND</sup> Street WE Stop 7701  
Washington, DC 20593-7701

RE: Request for Project Review – Construction of a 400 foot tall self-supported  
Communications Tower, RFF South Padre Island, Cameron County, Texas

Dear Mr. Tansey:

Please excuse the delay in responding to your June 18, 2009 letter to the Town of South Padre Island Planning and Zoning Commission. It was just forwarded to me.

We have reviewed the materials provided to us in your correspondence and have found that this location is outside the limits of the Town of South Padre Island, and is therefore outside of our area of jurisdiction.

We appreciate the opportunity to provide input into your proposed project and wish you the best success with it.

Sincerely,

Town of South Padre Island  
Planning and Zoning Commission



Robert A. Fudge  
Chairman

## **Tansey, Thomas**

---

**From:** 2100@townspi.com on behalf of Chief Robert Rodriguez [2100@townspi.com]  
**Sent:** Wednesday, July 15, 2009 12:52 PM  
**To:** Tansey, Thomas  
**Cc:** michel.w.lalor@uscg.mil  
**Subject:** 400 foot Communication Tower at South Padre Island

Thomas A. Tansey

US Coast Guard

2100 2nd St. SW Stop 7701

Washington DC

Reference: Project review - construction of a 400 foot tall self-supported communication tower, RFF South Padre Island, Cameron County, Texas

As requested, a review was made by this agency (South Padre Island Police Dept.) - we find no issues with this communication tower project.

Respectfully,

Robert Rodriguez, Chief of Police

4601 Padre Blvd.

South Padre Island, Texas

(956)-761-3070

TEXAS HISTORICAL COMMISSION  
*real places telling real stories*

August 17, 2009

Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office  
United States Coast Guard  
Department of Homeland Security  
2100 2<sup>nd</sup> Street SW Stop 7701  
Washington D.C. 20593-7701

Re: *Project review under Section 106 of the National Historic Preservation Act of 1966  
Construction of a 400-foot High Communication Tower; Port Isabel Coast Guard  
Building (RTHL), South Padre Island, Cameron County  
Coast Guard & FCC/106 (THC Track #200911798)*

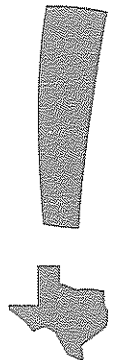
Dear Mr. Tansey:

Thank you for your correspondence describing the above referenced project which was received by our office on July 24, 2009. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Kim Barker, has completed its review of the project documentation provided. We acknowledge that the Section 106 process has been initiated but require submission of the Federal Communications Commission (FCC) Form 620 before continuing the consultation. Form 620 is the New Tower (NT) Submission Packet to be completed by or on behalf of Applicants to construct new antenna support structures by or for the use of applicants, tower owners, and licensees of the FCC.

We **concur** that the Port Isabel Coast Guard Building, a Recorded Texas Historic Landmark, is eligible for listing in the National Register of Historic Places under Criterion A for its relationship to important historical events in American History and its significance in the areas of transportation and military.

It is our understanding that the project proposal includes the construction of a 400-foot tall (413 feet including the direction-finding antenna and lightening rod) communications tower as well as an adjoining concrete shelter, emergency back-up generator, propane fuel tank and an ice bridge, all contained within a 75-foot by 75-foot fenced compound located adjacent to the Port Isabel Coast Guard Building. To meet Federal Aviation Administration (FAA) standards, the communication tower will either be painted with equal-width alternating bands of aviation orange and white, or will remain unpainted but have medium intensity white daytime strobe lighting; both configurations require red nighttime lighting. We **concur** that the proposed project will have an adverse visual effect on the Port Isabel Coast Guard Building; the proposed project will have no adverse direct effects on historic resources.



The Port Isabel Lighthouse, a National Register of Historic Places-listed resource, is located outside of the proposed 2-mile Area of Potential Effects (APE). Given the presence of the Laguna Madre between the Lighthouse and the proposed tower, and the resulting lack of visual obstructions between them, the proposed tower would be visible from the Port Isabel Lighthouse. Selection of the unpainted tower option, instead of the orange and white configuration, would have a lesser impact on the Port Isabel Lighthouse's viewshed, and is advised.

Section 106 regulations require that when any adverse effect determinations are made, the applicant must seek methods to avoid, minimize, or mitigate the adverse effect. Federal regulations also require that the applicant notify the Advisory Council on Historic Preservation (ACHP) of the adverse effect and invite their consultation. The views of any other interested parties such as neighbors, the South Padre Island Historical Preservation Commission, South Padre Island Historical Foundation, or other local historic preservation organizations must also be considered.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review, the required information, or if we can be of further assistance, please contact Kim Barker at 512/463-8952.**

Sincerely,

A handwritten signature in black ink, appearing to read 'Kim Barker', with a stylized, cursive script.

Kim Barker, Project Reviewer

for: Mark S. Wolfe, Deputy State Historic Preservation Officer

cc: Larry Lof, Chair, Cameron County Historical Commission

MSW/KAB



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Peter M. Holt  
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Boerne

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Lee M. Bass  
Chairman-Emeritus  
Fort Worth

---

Carter P. Smith  
Executive Director

August 19, 2009

Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office  
2100 2ND ST SW Stop 7701  
Washington, DC 20593-7701

RE: Draft Environmental Assessment for proposed communications tower,  
South Padre Island, Cameron County, Texas

Dear Mr. Tansey:

This letter is in response to your request for review of the Draft Environmental Assessment (EA) prepared for the proposed construction of a 400-foot self-supporting lattice communications tower and associated equipment within 75-foot by 75-foot fenced compound on U.S. Coast Guard (USCG) property. The No Action and Proposed Action Alternatives are being considered. Additionally, the USCG is considering both painted and unpainted tower options.

Texas Parks and Wildlife Department (TPWD) staff reviewed the information provided and offers comments concerning the following:

- Revegetation plan
- State listed species and migratory birds

Revegetation plan

The draft EA states in Section 3.5 that bare soils would be revegetated as a best management practice to minimize surface water runoff into the Laguna Madre. TPWD recommends that all revegetation efforts utilize locally adapted native species. TPWD discourages the use of Bermuda grass (*Cynodon dactylon*) in revegetation efforts.

State listed species

Section 3.9.4 addresses federally listed species but does not include state listed threatened and endangered species. In preparation of the final EA for the project, please review the most current TPWD county list for Cameron County, as rare species could be present depending upon habitat availability. These lists are now available online at

[http://www.tpwd.state.tx.us/landwater/land/maps/gis/ris/endangered\\_species/index.phtml](http://www.tpwd.state.tx.us/landwater/land/maps/gis/ris/endangered_species/index.phtml)

As stated in previous correspondence from TPWD, a review of the annotated county list of rare species for Cameron County, the Texas Natural Diversity

Mr. Tansey  
Page 2  
August 19, 2009

Database (TXNDD) and the project information provided indicates that two rare species have been documented within 1.5 miles of the proposed project site. These species include the Piping Plover (*Charadrius melodus*) and the Peregrine Falcon (*Falco peregrinus*). Piping Plovers winter in south Texas and utilize beaches, mudflats and sandflats. Suitable Piping Plover habitat does not appear to occur at the proposed project site.

As stated in the draft EA, the project site is located in the Central Flyway, through which many circum- and trans-Gulf migrants will pass. Peregrine Falcons and other raptors will likely move through the project area. Many resident species, including Brown Pelicans (*Pelecanus occidentalis*) and various herons, egrets, and shorebirds are also likely to occur in the area.

According to the information provided, the U.S. Fish and Wildlife Service (USFWS) *Interim Guidelines for Recommendations on Communication Tower Siting, Construction, Operation, and Decommissioning* have been considered in the design and operation of the proposed communication tower. Utilizing these recommendations should minimize potential impacts to migratory birds.

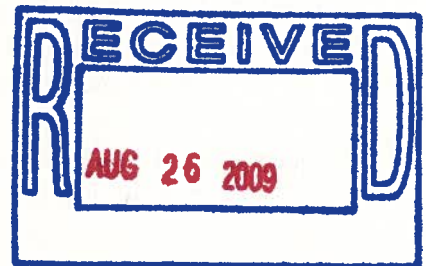
TPWD appreciates the opportunity to review and comment on the proposed project. Please contact me at (361) 825-3240 if you have any questions regarding our comments.

Sincerely,

A handwritten signature in blue ink that reads "Russell Hooten". The signature is fluid and cursive, with a long horizontal line extending from the end.

Russell Hooten  
Wildlife Habitat Assessment Program  
Wildlife Division

/rh 14248





OFFICE OF PARTNERSHIP AFFAIRS

THE UNIVERSITY OF TEXAS AT BROWNSVILLE and TEXAS SOUTHMOST COLLEGE

80 Fort Brown • Brownsville, Texas 78520 • (956) 882-6567 • Fax: (956) 882-8811 • Email: david.pearson@utb.edu • <http://blue.utb.edu/vpapa>

David E. Pearson, Ph.D.  
Vice President for Partnership Affairs

August 27, 2009

Mr. Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Officer  
U.S. Coast Guard  
2100 2nd St. SW STOP 7701  
Washington, DC 20593-7701

**Re: Request for Project Review-Construction of a 400-foot Tall Self Supported  
Communications Tower, RFF South Padre Island, Cameron County, Texas**

Dear Mr. Tansey:

Last week The University of Texas at Brownsville and Texas Southmost College (UTB/TSC) became aware of an effort by the United States Coast Guard to construct a 400-foot communications tower in the immediate vicinity of a portion of our campus, the Historic Coast Guard Station adjacent to the proposed site. We are concerned about this effort and would like to meet with you to discuss the matter further.

The Coast Guard Station and a number of other buildings on our campus are historically significant. UTB/TSC and the University of Texas System have made a conscious and consistent effort to ensure that all new construction compliments the historic buildings. This construction follows the guidelines of a Master Plan which has been conceived with input from many internal and community constituencies.

The Draft Environmental Assessment for RFF Padre Island, Texas states that "An adverse visual effect on the historic 1923 Coast Guard Station Port Isabel Building is anticipated". We agree. Given its size, the tower would be the dominant visual feature on the UTB/TSC campus.

In accordance with Section 106 of the National Historic Preservation Act, the adverse effect determination requires that the Coast Guard engage relevant stakeholders in consultation to resolve that adverse effect.

This letter is a request for consultation to begin that engagement.

Sincerely Yours,

*Letters 2009-032*

Gorgas Tower





www.townspi.com

JAMES "JAY" MITCHIM  
Building Official

4601 Padre Blvd.  
South Padre Island, TX 78597

Office (956) 761-1025  
Fax (956) 761-3898  
jmitchim@townspi.com

6.26.09

Dear Sirs,

The proposed project is not located within the corporate limits of the Town. The Town of South Padre Island has no jurisdiction outside its city limits.

JAMES MITCHIM  
Building Official

Received

JUL 7 2009



United States Department of Agriculture



USDA- Natural Resources Conservation Service  
101 South Main  
Temple, TX 76501  
254.742.9805

---

June 30, 2009

Mr. Thomas A. Tansey  
Environmental Program Manager  
Rescue 21 Project Office  
U. S. Coast Guard  
2100 2<sup>nd</sup> Street SW Stop 7701  
Washington, DC 20593-7701

Dear Mr. Tansey:

We have reviewed the project information pertaining to construction of a 400-foot tall self-supported communications tower, RFF South Padre Island, Cameron County, Texas.

This project should have no significant adverse impact on the environment or natural resources in the area. We do not require any permits, easements, or approvals for these activities.

Thank you for the opportunity to provide comments on these proposed projects.

Sincerely,

A handwritten signature in black ink that reads "Steven Bismarck". The signature is fluid and cursive.

For

DONALD W. GOHMERT  
State Conservationist

**Received**

JUL 15 2009

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**United States Department of the Interior**  
**FISH AND WILDLIFE SERVICE**  
Ecological Services - LRGV Sub Office  
Phone: (956) 784-7560 Fax: (956) 787-0547  
Rt. 2 Box 202-A  
Alamo, TX 78516  
August 27, 2009

Thomas A. Tansey, Environmental Program Manager  
Rescue 21 Project Office  
USCG  
2100 2<sup>nd</sup> Street SW Stop 7701  
Washington DC 20593-7701

Re: Consultation No.: 21410-2009-I-0353

Dear Mr. Tansey;

This responds to your June 18, 2009 letter received in this office on July 10, 2009, and the site-specific Draft EA received on July 29, 2009 regarding the effects of a proposed communications tower and compound on species Federally-listed as threatened and endangered. The USCG proposes to construct a 400-foot tall self-supported Communications Tower to be known as the Remote Fixed Facility (RFF) South Padre Island, located on USCG-owned property at Station South Padre Island, One Wallace Reed Road, South Padre Island, Cameron County, Texas. The proposed tower will be a 400-foot tall steel lattice tower with a direction-finding antenna mounted on top, and will be enclosed by a new 75' x 75' fenced compound that will also include a 12'x28' elevated steel platform containing a prefab equipment shelter, emergency backup generator and one 500-gallon propane fuel tank. A 2'x4' long ice bridge designed to support the transmission lines from the tower to the cable entry port will also be constructed. The addition of a DF antenna, mounting pole and lightning rod would increase the total height to approximately 413 feet above ground level. The proposed project site presently contains no structures and consists of an open, previously disturbed industrial/commercial area; a 305-foot tall guyed communications tower previously occupied the site and was dismantled by the USCG in 2005.

A wetland delineation study was conducted in December 2008, and two separate wetland areas totaling 2.01 acres were delineated near the project site. Although the proposed tower and associated compound will not be sited on wetlands, short utility access trenches will run through the wetland. It is understood that a section 404 Nationwide Permit will be required for temporary impacts resulting from trenching approximately 520 square feet (0.01 acres) in the wetland. BMPs will be used to minimize soil erosion impacts.

You have made the determination that the proposed project will not adversely affect any threatened or endangered species or critical habitat. Understanding that communication towers have been found to present a potential risk from collisions to migratory birds, you have taken into consideration the Service's "Interim Guidelines for Recommendations on Communications Tower Siting, Construction, Operation, and Decommissioning" to the maximum extent practicable.

Please note that the Service strives to respond to requests for project review within 30 days of receipt, however, this time period is not mandated by regulation. Responses may be delayed due to workload

and lack of staff. Failure to meet the 30-day timeframe does not constitute a concurrence from the Service that the proposed project will not have impacts to threatened and endangered species.

Based on the above recommendations and understandings, the Service notes that there will be a Not Likely to Adversely Affect on Federally listed species by the proposed project. For continued compliance under the Endangered Species Act, the Service recommends further consultation on any project-related impacts not described herein. If project plans change, portions of the project were not evaluated, or differ from the described above, please notify us. If we can be of further assistance, please contact Brunilda Fuentes-Capozello (956-784-7631), or Ernesto Reyes, Jr. on this letterhead.

Sincerely,



Ernesto Reyes, Jr.  
Fish & Wildlife Biologist

For  
Allan M. Strand  
Field Supervisor

cc: Field Supervisor, U.S. Fish and Wildlife Service, Corpus Christi, TX

References

Banks, R. C. 1979. Human-related mortality of birds in the United States. U. S. Fish and Wildlife Service, Spec. Sci. Rep.-- Wildl. 215.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

SEP 10 2009

Thomas A. Tansey  
Environmental Program Manager  
USCG Rescue 21 Project  
2100 2<sup>nd</sup> ST SW Stop 7701  
Washington, DC 20593-7701

RE: RFF Padre Island. TX

RE: Dear Mr. Tansey:

The Environmental Protection Agency (EPA) has received the above referenced Environmental Assessment (EA). We have no comments to offer. Thank you for your coordination.

Sincerely yours,

A handwritten signature in blue ink that reads "Cathy Gilmore".

Cathy Gilmore, Chief  
Office of Planning and  
Coordination (6EN-XP)



**APPENDIX II**  
**8-STEP PLANNING PROCESS FOR FLOODPLAINS AND WETLANDS**



## APPENDIX II

# 8-STEP PLANNING PROCESS FOR FLOODPLAINS AND WETLANDS

<b>Eight-Step Planning Process for Floodplains and Wetlands</b> <b>Construction of RFF South Padre Island, Texas</b>	
<b>Step 1:</b> Determine whether the Proposed Action is located in a wetland and/or the 100-year floodplain, or whether it has the potential to affect or be affected by a floodplain or wetland.	<p><b>Project Analysis:</b> According to FEMA mapping, the proposed project is located within the 100-year floodplain, within zone A8 (Flood Insurance Rate Map panel number 4801150001D, 1999).</p> <p>According to National Wetlands Inventory Maps and a site visit conducted on December 16, 2008, salt marsh wetlands are located in the project area. Approximately 0.01 acre of wetlands would be adversely affected by trenches dug for communications and electrical wires to the site.</p>
<b>Step 2:</b> Notify public at earliest possible time of the intent to carry out an action in a floodplain or wetland, and involve the affected and interested public in the decision-making process.	<p><b>Project Analysis:</b> A notice will be published by the applicant in a newspaper of general circulation when the EA is made available for public review.</p>
<b>Step 3:</b> Identify and evaluate practicable alternatives to locating the Proposed Action in a floodplain or wetland.	<p><b>Project Analysis:</b> The Proposed Action is located within the 100-year floodplain. The Proposed Action would result in temporary impacts to 0.01 acres (520 square feet) of wetlands.</p> <p>Other than the No Action Alternative, there are no practicable alternatives for construction of Remote Fixed Facility (RFF) South Padre Island. The Coast Guard conducted a diligent search for alternative tower sites and has determined that they cannot fulfill their purpose under the Rescue 21 program without construction of RFF South Padre Island on the project site.</p> <p>The following alternatives were evaluated in the EA:</p> <p><i>Alternative 1:</i> No Action</p> <p><i>Alternative 2:</i> Construction of RFF South Padre Island (Proposed Action)</p> <ul style="list-style-type: none"> <li>• Construction of a 400-foot-tall self-supported lattice communications tower within a 75-foot by 75-foot fenced compound.</li> <li>• Construction of a 12-foot by 28-foot elevated steel platform containing an equipment shelter, emergency backup generator, a 500-gallon propane fuel tank, and a 2-foot by 4-foot long ice bridge.</li> <li>• Narrow trenches for telecommunication wires.</li> </ul>

## 8-STEP PLANNING PROCESS FOR FLOODPLAINS AND WETLANDS

Eight-Step Planning Process for Floodplains and Wetlands Construction of RFF South Padre Island, Texas	
	<ul style="list-style-type: none"> <li>Equipment staging on paved surfaces or sparsely vegetated non-wetland areas adjacent to the project site.</li> </ul>
<b>Step 4:</b> Identify the full range of potential direct or indirect impacts associated with the occupancy or modification of floodplains and wetlands, and the potential direct and indirect support of floodplain and wetland development that could result from the Proposed Action.	<b>Project Analysis:</b> Although the Proposed Action would result in modification of the floodplain, it would not impede movement of floodwaters within the floodplain, thus would not increase the impacts to the floodplain above existing conditions. Construction of RFF South Padre Island would not support additional development of the floodplain
<b>Step 5:</b> Minimize the potential adverse impacts from work within floodplains and wetlands (identified under Step 4), restore and preserve the natural and beneficial values served by wetlands.	<p><b>Project Analysis:</b> The Coast Guard would obtain USACE Nationwide Permit 12 Utility Line Activities prior to construction. Nationwide Permit 12 would require the Coast Guard to restore the disturbed wetland areas once construction is complete; restoration would include, but is not limited to, retaining the top six inches of topsoil, storing it in a location separate from other removed soil, and placing it back on the top of the filled trenches. With implementation of mitigation measures required under Nationwide Permit 12, the Proposed Action would not result in permanent impacts on wetlands.</p> <p>The Coast Guard must follow all applicable local, State, and Federal laws, regulations and requirements and obtain and comply with all required permits and approvals, prior to initiating work on this project. The Coast Guard must apply BMPs for soil erosion prevention and containment during staging of equipment and project activities. Should project activities be delayed for 1 year or more after the date of this EA, coordination and project review by the appropriate regulating agencies must be reinitiated.</p>
<b>Step 6:</b> Re-evaluate the Proposed Action to determine: 1) if it is still practicable in light of its exposure to flood hazards; 2) the extent to which it will aggravate the hazards to others; 3) its potential to disrupt floodplain and wetland values.	<b>Project Analysis:</b> The Proposed Action remains practicable – construction of RFF South Padre Island would not aggravate flood hazards to others nor would it disrupt floodplain or wetland values.



## 8-STEP PLANNING PROCESS FOR FLOODPLAINS AND WETLANDS

<b>Eight-Step Planning Process for Floodplains and Wetlands</b> <b>Construction of RFF South Padre Island, Texas</b>	
<b>Step 7:</b> If the agency decides to take an action in a floodplain or wetland, prepare and provide the public with a finding and explanation of any final decision that the floodplain or wetland is the only practicable alternative. The explanation should include any relevant factors considered in the decision-making process.	<b>Project Analysis:</b> The Draft EA will serve as the public notice informing the public of the Coast Guard's decision to proceed with the project. The Draft EA includes rationale for floodplain impacts; a description of all significant facts considered in making the determination; a list of the alternatives considered; a statement indicating how the action affects the floodplain and wetlands; and a statement of how mitigation will be achieved, if necessary.
<b>Step 8:</b> Review the implementation and post-implementation phases of the Proposed Action to ensure that the requirements of the EOs are fully implemented. Oversight responsibility shall be integrated into existing processes.	<b>Project Analysis:</b> This step is integrated into the NEPA process and Coast Guard project management and oversight functions.



**APPENDIX III**  
**VISUAL IMPACT STUDY**



FINAL VISUAL IMPACT STUDY

CONSTRUCTION OF  
REMOTE FIXED FACILITY  
SOUTH PADRE ISLAND  
CAMERON COUNTY, TEXAS



*Prepared for*

**U.S. Department of Homeland Security  
United States Coast Guard  
2100 2<sup>nd</sup> Street, SW, Stop 7701  
Washington, DC 20593-7701**

July 2009

*Prepared by*



URS Group, Inc.  
200 Orchard Ridge Drive, Suite 101  
Gaithersburg, Maryland 20878  
**15301804.00400**

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## **SECTION ONE      INTRODUCTION**

The United States Coast Guard (USCG) is in the process of modernizing and replacing its antiquated maritime search and rescue communications system in the State of Texas as part of a nationwide initiative. The new, very high frequency-FM equipment will fill in existing coverage gaps in marine communications used for Coast Guard operational missions, including search and rescue, maritime law enforcement, maritime pollution prevention and response, and national defense. The new system, known as Rescue 21, is the maritime equivalent of a “911” communications system. It is intended to enhance maritime safety by minimizing the time that search and rescue teams spend looking for people in distress. Rescue 21 equipment will strengthen the United States’ homeland security capabilities, as well as other safety and security missions, benefiting both the Coast Guard and the American public.

Under contract to the Coast Guard, URS Group, Inc. (URS) prepared this Visual Impact Study to assess the potential visual impacts from construction of a new communication tower in the project area. This study was conducted as a component of the Environmental Assessment being prepared for this project, which takes into account compliance requirements under the National Environmental Policy Act of 1969 (42 U.S.C. 4321, 4331, 4332), the Council on Environmental Quality Implementing Regulations (40 CFR Parts 1500–1508), Department of Homeland Security Environmental Management Directive 023-01, *Environmental Planning Program*, the USCG Commandant Instruction M16475.1D, *National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts*. Compliance with Section 106 of the National Historic Preservation Act (16 U.S.C. 470 et seq.) is a component of this study, which also assesses the effects the project will have on historic properties.

### **1.1      PROPOSED UNDERTAKING**

The proposed communications tower is to be erected on U.S. Government-owned property at 1 Wallace Reed Road, South Padre Island, TX (Figure 1, Appendix A). The USCG proposes to construct a 400-foot-tall self-supported lattice communications tower as part of the Rescue 21 program. The addition of a top-mounted direction finding (DF) antenna and a lightning rod will bring the overall height of the tower to 413 feet. The proposed tower would be contained within a 75-foot by 75-foot fenced compound. The new tower is being constructed to expand transmission area coverage, filling in gaps in VHF-FM marine communications used for USCG operational missions including search and rescue, maritime law enforcement, maritime pollution prevention and response, and national defense. The tower will be designated Remote Fixed Facility (RFF) South Padre Island.

The USCG is considering two options to meet Federal Aviation Administration (FAA) standards as described in the FAA Advisory Circular AC70/7460-1K, Change 2, *Obstruction Marking and Lighting*:

- *Option 1:* A 400-foot-tall tower painted with equal-width alternating bands of aviation orange and white according to FAA standards. This option would not require daytime white strobe lighting. For nighttime lighting, two L-864 red flashing (2,000 candela) beacons would be mounted at the 400-foot level and three at approximately the 200-foot level. The L-864 lights flash synchronously at a rate of 20 times per minute in 1.5-second on/off intervals. Three L-810 steady burning (32.5 candela) red obstruction lights would



be mounted at both the 100-foot and 300-foot levels. Light-emitting diode (LED) light fixtures would be used in lieu of incandescent bulbs because they require less maintenance and less energy to operate. The lights turn on and off automatically and operate only during the nighttime.

- *Option 2:* A 400-foot-tall unpainted tower (the tower would remain a steel grey color) that would require daytime medium intensity (20,000 candelas) white strobe lighting in accordance with FAA standards for dual lighting (FAA Style E). Nighttime lighting would be the same in appearance, flash rate, and intensity as described for Option 1. The daytime white strobes (L-865) would flash 40 times per minute and would be mounted at the same elevations and in the same number as the nighttime red L-864 beacons in a combined dual red/white LED fixture.

## 1.2 AREA OF POTENTIAL EFFECTS

To assess the effects of the proposed undertaking on historic properties, an Area of Potential Effects (APE) was developed based on the type and height of the facility, the surrounding topography and construction, and visibility in the vicinity of the proposed tower. The APE consists of a 2-mile radius extending from the proposed project site (Figure 2, Appendix A). The APE was determined based on the actual visibility or viewshed of the proposed structure to and from other historic properties within this area.

All known or potential historic properties located within the viewshed were assessed for potential adverse effects associated with the Proposed Undertaking. An adverse effect is defined as any undertaking that will alter, either directly or indirectly, the characteristics that qualify a property for inclusion in the National Register for Historic Places (NRHP).

## 1.3 SITE DESCRIPTION

RFF South Padre Island would be constructed on USCG-owned property located at 1 Wallace Reed Road, South Padre Island, Texas. The proposed tower site is within the grounds of USCG Station South Padre Island and approximately 200 feet from the 1923 USCG Station Port Isabel Building. The proposed tower site is currently vacant, is characterized by sandy soil, minimal vegetation, and flat topography, and is located just above sea level between Brazos Santiago Pass and the Gulf of Mexico. South Padre Island is a popular tourist destination that has many high-rise hotels and condominium buildings. The closest high-rise building is located approximately 0.6 miles away from the proposed tower site to the northeast.

The USCG has historically used this property for several Long Range Aid to Navigation (LORAN) beacon towers. LORAN is a terrestrial radio navigation system using low frequency radio transmitters. The property was historically known as LORAN Station Port Isabel (STA “T” 2L6 and STA “P” 3H3) constructed in 1945 and 1968, and more recently as a National Distress and Response System (NDRS) communications site. The NDRS High Level Site (HLS) Port Isabel antennas were attached to a 305-foot tall, painted guyed tower. The HLS tower was removed in March 2005 when the NDRS equipment was temporarily relocated to a commercial tower in Port Isabel.

## **SECTION TWO      METHODOLOGY**

### **2.1      RESEARCH**

In April 2009, Cindy Thomack, URS Architectural Historian meeting the *Secretary of the Interior's Professional Qualification Standards* (36 CFR Part 61) in the discipline of Architectural History, conducted background research and a windshield survey of the areas surrounding the proposed tower site for the proposed RFF South Padre Island to identify any cultural resources within the APE that are listed, or determined eligible for listing, in the National Register of Historic Places (NRHP) or any potential historic properties that would require further study and evaluation. Background research conducted online included the National Register Information System (NRIS) and Texas Historical Commission's (THC) Historic Sites Atlas. The THC's Historic Sites Atlas contains information on recorded Texas Historic Landmarks (THLs). On April 6-7, 2009, background research was also conducted at the THC—the State Historic Preservation Office (SHPO)—to identify above-ground and archaeological resources within the immediate boundaries of the proposed project site. The project also includes a 2-mile APE for above-ground resources and a 1-mile study area for archaeological resources. Additional background information and historic photographic materials were provided by the USCG Historian's Office in Washington, D.C.

A visit to the proposed tower site was conducted on April 7–10, 2009, to observe the setting of the proposed RFF communications tower. Photographs of the proposed tower site were taken during the site visit and are provided in Appendix B.

A windshield survey and visual inspection of the area within the 2-mile APE was conducted to identify any resources 50 years of age or older not previously identified in earlier research. Unless written documentation was found, age determinations were made based on visual analysis. In addition, an interview was also conducted with Steve Hathcock, Chairperson of the South Padre Island Historical Preservation Commission and co-founder and President of the South Padre Island Historical Foundation, and Bill Martin, Assistant Team Leader of State and Federal Review Section at the THC, to identify existing historic resources within the APE.

### **2.2      CRITICAL VIEWPOINTS**

Four critical viewpoints of the proposed tower site were selected to determine how the RFF tower would impact views from known historic resources. The four critical viewpoints were determined based on the presence of historic resources in relationship to the proposed tower site. To determine visual impacts from these critical areas, representative photographs were taken from each of the four critical viewpoints toward the proposed tower site. It should be noted that critical viewpoint B is located outside the APE. This viewpoint was selected because the resource is a prominent and significant historic property that, while outside the APE, is still within the viewshed. A map showing the location of each critical viewpoint is provided in Figure 3 of Appendix A.

#### ***Critical Viewpoint A***

Critical Viewpoint A is from the general area of the north end of Brazos Island, on the south side of the Brazos Santiago ship channel. Within Critical Viewpoint A is one identified historic

property—the Brazos Santiago Depot Site—and two potential historic properties—the 1864 Brazos Padre Island Lighthouse Site and the 1881 Lifesaving Station Brazos Santiago Site. All three of the resources were originally constructed on the northern end of Brazos Island.

The Brazos Santiago Depot Site was listed in the National Register of Historic Places (41CF4, NRIS # 71000923) on July 14, 1971. The exact address and geographic coordinates of the Depot Site are restricted.

The 1864 Brazos Santiago Lighthouse was a 34-foot tall, three-story wood-frame tower, built to replace a circa 1854, 35-foot tall timber-frame tower, located on the north side of the Brazos Santiago channel, that was burned by the Confederate Army in the early part of the Civil War. The 1864 Lighthouse was constructed by Lighthouse Engineer M. F. Bonzano near the Brazos Santiago Army Depot on the south side of the ship channel at the request of the U.S. Army. The 1881 Life-Saving Station Brazos Santiago was constructed near the entrance to Brazos Santiago, on the south side of the channel. It was later replaced by a 1918 Life-Saving Station constructed on Boca Chica Beach, which was subsequently destroyed by an unnamed hurricane in 1919. These resources are no longer extant and the exact locations of the 1864 Lighthouse and 1881 Lifesaving Station are unknown at this time.

### ***Critical Viewpoint B***

Critical Viewpoint B is the site of the Point Isabel Lighthouse, which was constructed in 1853 and is located in Port Isabel at the entrance to the Queen Isabella Memorial Bridge that crosses over to South Padre Island. The lighthouse sits atop a small grassy mound that was once part of a large bluff overlooking Laguna Madre. The Point Isabel Lighthouse was listed in the NRHP on April 30, 1976, and is located 2.7 miles from the proposed tower site, outside of the 2-mile APE.

### ***Critical Viewpoint C***

Critical Viewpoint C is the current site of the 1923 USCG Station Port Isabel, located approximately 1,000 feet east of the 1974 modern Coast Guard Station South Padre Island. The 1923 USCG Station Port Isabel was built after an unnamed 1919 hurricane destroyed the USCG Station Brazos on Boca Chica Beach. The building is now used as an annex for the University of Texas-Brownsville/Texas Southmost College. The property is a recorded THL. The 1923 USCG Station Port Isabel is located approximately 200 feet northeast of the proposed tower site.

### ***Critical Viewpoint D***

Critical Viewpoint D includes the former location of the 1879 Brazos Santiago Light, which was a hexagonal screwpile platform, with a wood-frame cottage-style superstructure, located in the shallow water of Laguna Madre. The 1879 Brazos Santiago Light Site is located approximately 831 feet southwest of the proposed tower site. A photograph was taken off-shore from Critical Viewpoint D looking toward the proposed tower site.

## **2.3 PHOTO SIMULATIONS**

Using field data and photographs, photo simulations of the proposed tower options were created. Two photo simulations were created from each critical viewpoint: one depicting an unlighted painted self-supported lattice tower, and one depicting an unpainted self-supported lattice tower with medium-intensity daytime lights. The evaluation and findings in this report are based on these photo simulations from the critical viewpoints. The Photographic Log in Appendix B includes the photo simulations from each critical viewpoint.

**SECTION THREE FINDINGS: IDENTIFICATION OF HISTORIC PROPERTIES**

A review of the NRIS identified two historic properties—the Brazos Santiago Depot Site and the Point Isabel (Port Isabel) Lighthouse, both NRHP-listed properties. A review of the THC files identified the 1923 USCG Station Port Isabel, a THL. Records at the USCG Historian’s Office revealed three additional potential historic properties—the 1864 Brazos Padre Island Lighthouse Site, the 1881 Life-Saving Station Brazos Santiago Site, and the 1879 Brazos Santiago Light Site. Two of the six properties are currently extant, only one is located within the above-ground APE. The 1923 USCG Station Port Isabel is a potential historic property that is located within the APE. The Point Isabel Lighthouse (Port Isabel) is a historic property that located just outside the APE, but is within the viewshed. There are four properties that are no longer extant—the Brazos Santiago Depot, the 1864 Brazos Padre Island Lighthouse, the 1881 Life-Saving Station Brazos Santiago, and the 1879 Brazos Santiago Lighthouse. Of these four archaeological resources, only one has been formally identified and evaluated for the NRHP. The Brazos Santiago Depot Site is a historic property that is located within the APE and is an archaeological site. General locations for the 1864 Brazos Padre Island Lighthouse Site, the 1881 Life-Saving Station Brazos Santiago Site, and the 1879 Brazos Santiago Lighthouse Site have been determined; however, precise locations are unknown at this time.

The table below provides the resource name, location, NRHP status, and distance and direction from the proposed tower site, and indicates whether the proposed tower would be visible (classified as high, medium, and low visibility) from each historic property (critical viewpoint).

**Table 1: Tower Visibility from Historic Properties**

<b>Critical Viewpoint</b>	<b>Property Name</b>	<b>Location</b>	<b>NRHP Status</b>	<b>Distance/ Direction from Proposed Tower Site</b>	<b>Degree of Tower Visibility</b>
A-1	Brazos Santiago Depot Site	North end of Brazos Island, TX	Listed	1.06 miles southeast	Moderate
A-2	1864 Brazos Padre Island Lighthouse Site	North end of Brazos Island, TX	Not Evaluated	Unknown	Unknown
A-3	1881 Life-Saving Station Brazos Santiago Site	North end of Brazos Island, TX	Not Evaluated	Unknown	Unknown
B	Point Isabel (Port Isabel) Lighthouse	Port Isabel, TX	Listed	2.7 miles northwest (outside APE)	Low
C	1923 USCG Station Port Isabel	South Padre Island, TX	Potentially Eligible	275 feet northeast	High
D	1879 Brazos Santiago Light Site	Laguna Madre due south of 1974 USCG Station	Not Evaluated	1,113 feet southwest	High

A windshield survey did not identify any additional extant properties over 50 years of age in the APE. Steve Hathcock, Chairperson of the South Padre Island Historical Preservation Commission and President of the South Padre Island Historical Foundation, pointed out that most of the development on South Padre Island occurred within the past 50 years, and, primarily, within the last 10 to 20 years (Bill Martin, personal communication, 2009).

## **SECTION FOUR     ASSESSMENT OF EFFECTS ON HISTORIC RESOURCES**

The photo simulations of the two tower alternatives at each critical viewpoint (Appendix B) were analyzed for the effect of the proposed tower on historic properties, including the natural and built landscape. Visual integrity can be present in well-kept urban and rural landscapes, as well as in natural settings. Based on these photo simulations, the proposed tower's impacts on the visual integrity at each critical viewpoint and its effect on the historic properties located at or near that viewpoint are presented below.

### **4.1     CRITICAL VIEWPOINT A-1: BRAZOS SANTIAGO DEPOT SITE**

The remains of the Brazos Santiago Depot are a NRHP listed property located on the north end of Brazos Island in the Gulf of Mexico, across the Brazos Santiago Pass from the southern end of South Padre Island. The ruins of the site consist of a historic depot and military camp with periods of occupation between the second and third quarters of the nineteenth century. Because there are no extant buildings and/or structures, the Brazos Santiago Depot is an archaeological resource. The site has yielded information on Civil War campaigns, daily life of the U.S. army soldiers, the Brazos Santiago Depot built in 1846, and may contain evidence for Mexican Army use in 1830s to 1840s. The site occurs encompasses coastal dunes near the Brazos Santiago Pass and low hummocky dunes near Laguna Madre (Cipra 1997).

The Brazos Santiago Depot was originally constructed in 1846 under the authority of General Zachary Taylor at the mouth of Brazos Santiago on Brazos Island. The Depot was used to support U.S. Army supply efforts during the surrendering of troops in 1861 shortly before the outbreak of the Civil War, the changing of hands between the Union and Confederate armies, and the Mexican American War. The Brazos Santiago Depot was abandoned in 1867 after being damaged by a severe hurricane (Cipra 1997).

#### **4.1.1     Evaluation**

The site was nominated for listing in the NRHP under Criterion A (event) for its relationship to important historical events in American History and its significance in the areas of commerce, military, and transportation. The site was listed in the NRHP on July 14, 1971.

#### **4.1.2     Integrity Analysis**

The buildings and/or structures associated with this site are no longer extant and, therefore, no longer retain integrity of design, materials, workmanship, feeling, and association as an above-ground resource. It may, however, still retain integrity as an archaeological site. An archaeological investigation was not conducted as a part of this study.

#### **4.1.3     Effects Analysis of Critical Viewpoint A-1: Option 1 – Painted Tower**

This option would introduce a new element visible to the northwest from the grounds of the north end of Brazos Island. Overall visual impacts would be reduced by the distance from the tower, which would be more than 1 mile away. The introduction of an additional vertical element would not further diminish the visual integrity of the landscape because of the presence of

existing high-rise buildings also visible in the surrounding viewshed. Based on the photo simulations of the painted tower option, the impact on the viewshed from Critical Viewpoint A would be moderate. Construction of a painted tower without lights would have no adverse effect on the Brazos Santiago Depot as an archaeological resource.

### 4.1.4 Effects Analysis of Critical Viewpoint A-1: Option 2 – Unpainted Tower with Lights

This option would introduce a new element visible to the northwest from the grounds of the north end of Brazos Island. Overall visual impacts would be reduced by the distance of the historic property from the proposed tower, which would be more than 1 mile away. The introduction of an additional vertical element would not further diminish the integrity of the landscape because of the presence of existing high-rise buildings also visible in the surrounding viewshed. Based on the photo simulations of the unpainted tower option, the impact on the viewshed from Critical Viewpoint A would be moderate. Construction of an unpainted tower with lights would have no adverse effect on the Brazos Santiago Depot as an archaeological resource.

## 4.2 CRITICAL VIEWPOINT A-2: 1864 BRAZOS PADRE ISLAND LIGHTHOUSE SITE



**Exhibit 1: Ruins of the 1864 Brazos Padre Island Lighthouse (World 2009)**

According to the USCG Historian's Office, the general location of the 1864 Brazos Padre Island Lighthouse Site is limited to the north end of Brazos Island; however, the precise location is

undetermined. Because the lighthouse is no longer extant, the site would likely be an archaeological resource. It is not known whether the site would be eligible for listing in the NRHP.

In 1864, in order to support U.S. Army supply and troop ships arriving in Brownsville, Lighthouse Engineer, M. F. Bonzano constructed a replacement light near the Army Depot on the south side of the ship channel, on the northern tip of Brazos Island. This was the first beacon or lighthouse built on the southern side of the ship channel, on the opposite side of the channel from the 1853 and 1854 beacons. Congress had prescribed that a lighthouse be constructed on South Padre Island. Despite this provision, Bonzano built the three-story, 34-foot tall, wood-frame tower on Brazos Island, calling it the “Brazos Padre Island Light House” presumably to conceal the fact that it was built in the wrong location. The 1864 Brazos Padre Island Lighthouse was completely swept away by a hurricane in September of 1874, which also led to the death of the keeper’s wife (Cipra 1997).

### **4.2.1 Evaluation**

The site cannot be evaluated as the exact location is unknown at this time.

### **4.2.2 Integrity Analysis**

The site cannot undergo an analysis of its integrity as the exact location is unknown at this time.

### **4.2.3 Effects Analysis of Critical Viewpoint A-2: Option 1**

While this option would introduce a new element visible to the northwest from the grounds of the north end of Brazos Island, effects cannot be assessed as the exact location of the site is unknown at this time. Since the lighthouse is no longer extant, this is not an above-ground resource and, because the site is not located within or adjacent to the project site, no direct impacts to archaeological resources are anticipated.

### **4.2.4 Effects Analysis of Critical Viewpoint A-2: Option 2**

While this option would introduce a new element visible to the northwest from the grounds of the north end of Brazos Island, effects cannot be assessed as the exact location of the site is unknown at this time. Since the lighthouse is no longer extant, this is not an above-ground resource and, because the site is not located within or adjacent to the project site, no direct impacts to archaeological resources are anticipated.

## **4.3 CRITICAL VIEWPOINT A-3: 1881 LIFE-SAVING STATION BRAZOS SANTIAGO SITE**

According to the USCG Historian’s Office, the general location of the 1881 Life-Saving Station Brazos Santiago Site is limited to the north end of Brazos Island; however, the precise location is undetermined. Because the life-saving station is no longer extant it is an archaeological resource.



### 4.3.1 Evaluation

The site cannot be evaluated as the exact location is unknown at this time.

### 4.3.2 Integrity Analysis

The site cannot undergo an analysis of its integrity as the exact location is unknown at this time.

### 4.3.3 Effects Analysis of Critical Viewpoint A-3: Option 1

While this option would introduce a new element visible to the northwest from the grounds of the north end of Brazos Island, effects cannot be assessed as the exact location of the site is unknown at this time. Since the life-saving station is no longer extant, this is not an above-ground resource and, because the site is not located within or adjacent to the project site, no direct impacts to archaeological resources are anticipated.

### 4.3.4 Effects Analysis of Critical Viewpoint A-3: Option 2

While this option would introduce a new element visible to the northwest from the grounds of the north end of Brazos Island, effects cannot be assessed as the exact location of the site is unknown at this time. Since the life-saving station is no longer extant, this is not an above-ground resource and, because the site is not located within or adjacent to the project site, no direct impacts to archaeological resources are anticipated.

## 4.4 CRITICAL VIEWPOINT B: POINT ISABEL LIGHTHOUSE



**Exhibit 2: Point Isabel (Port Isabel) Lighthouse 2009 (URS)**

The Point Isabel Lighthouse is located in Port Isabel on Texas Highway 100 at the entrance to the Queen Isabella Memorial Bridge, which spans the Laguna Madre to South Padre Island. While the building is modernly called the Port Isabel Lighthouse, the building was listed in the NRHP as the Point Isabel Lighthouse on April 30, 1976.

Construction of the lighthouse began in 1851 and was completed in 1853. However, the lighthouse inspector of Galveston, Texas deemed the building inadequate, and, in turn, a new lighthouse was completed in 1855 and a third-order Fresnel lens illuminated by a single lamp was installed in the building. The lighthouse was temporarily decommissioned between 1863 and 1866 as a result of the Civil War. Decommissioned again in 1927, the lighthouse was not used during the second quarter of the twentieth century, but was saved from ruin in 1950 with a full restoration by the Texas State Park Board. While the lighthouse is operated predominately as the Port Isabel Lighthouse State Historical Park, the building serves as a functioning navigational aid (Cipra 1997).

The Point Isabel Lighthouse remains one of the oldest functioning lighthouses on the Texas Gulf Coast.

### 4.4.1 Evaluation

The lighthouse was listed in the NRHP under Criterion A (event) for its relationship to important historical events in American History and its significance in the areas of transportation and communications. The lighthouse was listed in the NRHP on April 30, 1976.

### 4.4.2 Integrity Analysis

This resource appears to retain integrity of design, materials, workmanship, feeling, association, location, and setting.

### 4.4.3 Effects Analysis of Critical Viewpoint B: Option 1 – Painted Tower

This option would introduce a new element visible to the southeast from the Point Isabel Lighthouse. Overall visual impacts would be greatly reduced by the distance from the tower, which would be more than 2 miles away. An additional vertical element would not further diminish the integrity of the landscape due to the proliferation of existing high-rise buildings also visible in the viewshed. Based on the photo simulations of the painted tower option, the impact to the visual integrity of the viewshed from critical viewpoint B would be low. The construction of a painted tower without lights will have no direct adverse effect on the Point Isabel Lighthouse.

### 4.4.4 Effects Analysis of Critical Viewpoint B: Option 2 – Unpainted Tower with Lights

This option would introduce a new element visible to the southeast from the Point Isabel Lighthouse. Overall visual impacts would be greatly reduced by the distance from the tower, which would be more than 2 miles away. An additional vertical element would not reduce the visual integrity of the landscape due to the proliferation of existing high-rise buildings also visible in the viewshed. Based on the photo simulations of the unpainted tower option, the impact on the visual integrity of the viewshed from critical viewpoint B would be low. The

construction of an unpainted tower with lights will have no adverse effect on the Point Isabel Lighthouse.

### **4.5 CRITICAL VIEWPOINT C: 1923 USCG STATION POINT ISABEL**



**Exhibit 3: 1923 USCG Station Port Isabel, 2009 (URS)**



**Exhibit 4: 1923 USCG Station Port Isabel (left) and 1879 Brazos Santiago Light (right),  
Post 1923 (USCG Historian's Office)**



**Exhibit 5: Unidentified Lighthouse (left), 1923 USCG Station Port Isabel (middle), and  
Station Flag Tower (right), August 20, 1934 (USCG Historian's Office)**

The 1923 USCG Station Port Isabel, historically referred to as the Point Isabel USCG Building and Brazos Station #222, is situated on the grounds of the Coast Guard-owned property located

at 1 Wallace Reed Road, South Padre Island, Texas, and is adjacent to the modern USCG Station South Padre Island facility. The resource is a recorded THL.

The Federal government has operated a coastal installation at Point Isabel since 1852. This building is the third permanent station building erected by the USCG at the entrance to Brazos Santiago, and is one in a line of nine stations established along the Gulf of Mexico from Florida to the Texas-Mexico border. Originally consisting of a main floor, attic, and lookout tower (all elevated off the ground on wood and concrete pilings), the building served as barracks and headquarters for the USCG unit that patrolled the coastline and conducted sea rescues (Cipra 1997).

### 4.5.1 Evaluation

This building is a recorded THL and is potentially eligible for listing in NRHP under Criterion A (event) for its relationship to important historical events in American History and its significance in the areas of transportation and military.

### 4.5.2 Integrity Analysis

This resource appears to retain integrity of design, materials, workmanship, feeling, association, location, and setting.

### 4.5.3 Effects Analysis of Critical Viewpoint C: Option 1 – Painted Tower

This option would introduce a new element that would be highly visible to the southwest from the 1923 USCG Station Port Isabel. The tower would be immediately adjacent to the historic resource. Based on the photo simulations of the painted tower option, the impact to the integrity of the viewshed from critical viewpoint C would be high. The construction of a painted tower without lights would have an adverse effect on the Coast Guard Station Port Isabel due to its proximity to the new tower.

### 4.5.4 Effects Analysis of Critical Viewpoint C: Option 2 – Unpainted Tower with Lights

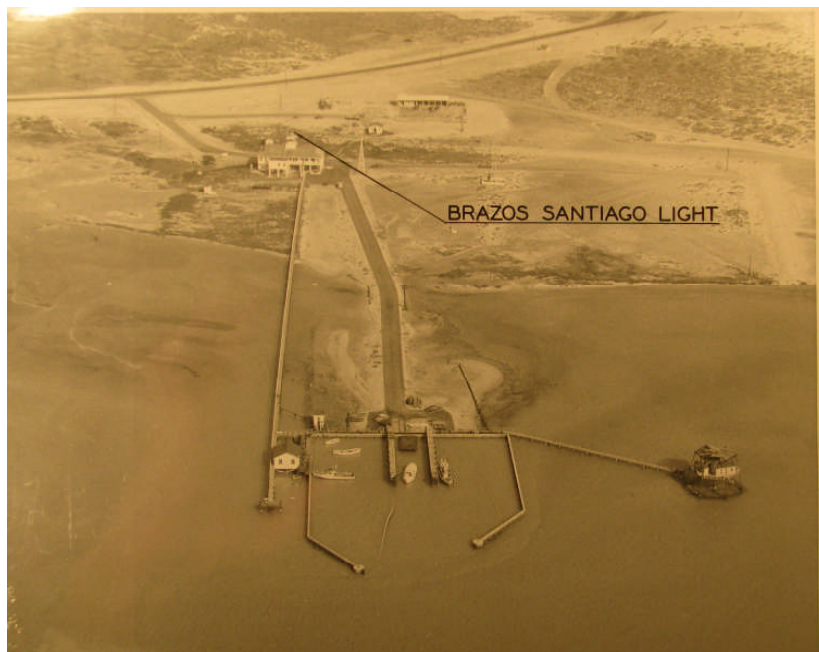
This option would introduce a new element that would be highly visible to the southwest from the 1923 USCG Station Port Isabel. The tower would be immediately adjacent to the resource. Based on the photo simulations of the unpainted tower option, the impact to the integrity of the viewshed from critical viewpoint C would be high. The construction of an unpainted tower with lights would have an adverse effect on the Coast Guard Station Port Isabel due to its proximity to the new tower.



### 4.6 CRITICAL VIEWPOINT D: 1879 BRAZOS SANTIAGO LIGHT SITE



**Exhibit 6: the Brazos Santiago Light (left) and the Station Port Isabel Boathouse (right), July 1945 (USCG Historian's Office)**



**Exhibit 7: 1923 USCG Station Port Isabel and relocated Brazos Santiago Light (lower right), January 1955 (USCG Historian's Office)**

The Brazos Santiago Light Site is located at the southwest end of South Padre Island; however, the precise location of the site is not known at this time.

The 1879 Brazos Santiago Light was built to replace the 1864 Brazos Santiago Lighthouse, located adjacent to the Brazos Santiago Depot on the north end of Brazos Island and destroyed by the September 1874 hurricane. Rather than rebuild on the same, more exposed location next to the former Army Depot and in order to have greater resistance to storms, the 1879 Brazos Santiago Light was relocated back to the north side of the ship channel, in the more protected shallow waters of Laguna Madre, off the southwest shore of South Padre Island. The new facility was to be a manned lighthouse elevated above the water on a hexagonal, screwpile platform, with wood-frame cottage-style superstructure. The 1879 Brazos Santiago Light site is approximately 1,113 feet southwest of the proposed tower site. The cottage style building burned down in 1940 leaving only the steel platform and supporting pilings. Only the ruins of the 1879 Brazos Santiago Lighthouse remain and they are currently located underwater (Cirpa 1997).

After the fire, the light was temporarily rebuilt on the same elevated steel platform. In 1943, the fifth-order Fresnel lens was transferred to the top of the 1923 USCG Station Port Isabel's boathouse just to the north and adjacent to the boat basin. When the Boathouse burned in 1949, the light was once again relocated further inland to the 1923 USCG Station Port Isabel building, but was still designated the "Brazos Santiago Light." That light is no longer in service, and, in 1981, was once again relocated to a USCG "radio beacon tower," 136 feet above sea level (Cipra 1997).



**Exhibit 8: 1879 Brazos Santiago Light, 1926 (USCG Historian's Office)**

### **4.6.1 Evaluation**

The site has not been evaluated as an archaeological resource.

### **4.6.2 Integrity Analysis**

The site cannot undergo an analysis of its integrity as no evaluation was undertaken.

### **4.6.3 Effects Analysis of Critical Viewpoint D: Option 1 – Painted Tower**

While this option would introduce a new element visible to the northwest from the grounds of the north end of Brazos Island, effects cannot be assessed as the exact location of the site is unknown at this time. Since the lighthouse is no longer extant, this is not an above-ground resource and, because the site is not located within or adjacent to the project site, no direct impacts to archaeological resources are anticipated.



### **4.6.4 Effects Analysis of Critical Viewpoint D: Option 2 – Unpainted Tower with Lights**

While this option would introduce a new element visible to the northwest from the grounds of the north end of Brazos Island, effects cannot be assessed as the exact location of the site is unknown at this time. Since the lighthouse is no longer extant, this is not an above-ground resource and, because the site is not located within or adjacent to the project site, no direct impacts to archaeological resources are anticipated.

**SECTION FIVE CONCLUSION**

The construction of a 400-foot tall communications tower in either design option (painted without daytime lights or unpainted with daytime lights) would have no adverse effect on the Brazos Santiago Depot Site, the 1864 Brazos Padre Island Lighthouse Site, the 1881 Lifesaving Station Brazos Santiago Site, and the 1879 Brazos Santiago Light Site, as these are archaeological resources and not subject to visual effects. There would be no adverse effect to the Port Isabel Lighthouse located across Laguna Madre. The proposed project would have an adverse effect on the 1923 USCG Station Port Isabel because of the new tower's proximity to this resource.

Consideration was given to the visual effects of the proposed RFF tower during the daytime for both design options—either a painted tower without daytime lighting, with aviation orange and white painted bands; or an unpainted tower with medium intensity (20,000 candela) white strobe obstruction lights (FAA L-865) which will flash 40 times per minute. Due to the mass of the self supported tower, the painted option may be more visually obtrusive than the unpainted option with medium intensity daytime strobe lights.

Consideration was also given to the visual effect during the nighttime of the proposed replacement tower which will use 2,000 candela, red light emitting diode (LED) beacon lights (FAA L-864) which will flash 20 times per minute and steady burning low intensity (32.5 candela) red obstruction lights (L-810). Both of the tower alternatives (painted and unpainted) will use the same nighttime lighting scheme.

Based on the photo simulations, from a distance there is little to no difference in the degree of visibility between the two design options of the tower (painted without daytime lights or unpainted with daytime lights). The construction of the proposed tower would have a low to moderate impact on the visual integrity of the existing viewshed from Critical Viewpoints A and B, and a high impact on the visual integrity of the existing viewshed from Critical Viewpoints C and D.

**Table 2: Effects to Historic Properties**

<b>Property Name (Critical Viewpoint)</b>	<b>Location</b>	<b>NRHP Status</b>	<b>Distance/Direction from Proposed Tower Site</b>	<b>Effects Determination</b>
Brazos Santiago Depot Site (Critical Viewpoint A)	North end of Brazos Island, TX	Listed	1.06 miles southeast	No Effect
1864 Brazos Padre Island Lighthouse Site (Critical Viewpoint A)	North end of Brazos Island, TX	Not Evaluated	Unknown	No Effect
1881 Life-Saving Station Brazos Santiago Site (Critical Viewpoint A)	North end of Brazos Island, TX	Not Evaluated	Unknown	No Effect
Point Isabel (Port Isabel) Lighthouse (Critical Viewpoint B)	Port Isabel, TX	Listed	2.7 miles northwest (outside APE)	No Adverse Effect
1923 USCG Station Port Isabel (Critical Viewpoint C)	South Padre Island, TX	Potentially Eligible	275 feet northeast	Adverse Effect
1879 Brazos Santiago Light Site (Critical Viewpoint D)	Laguna Madre due south of 1974 USCG Station	Not Evaluated	1,113 feet southwest	No Effect

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**SECTION SIX      REFERENCES**

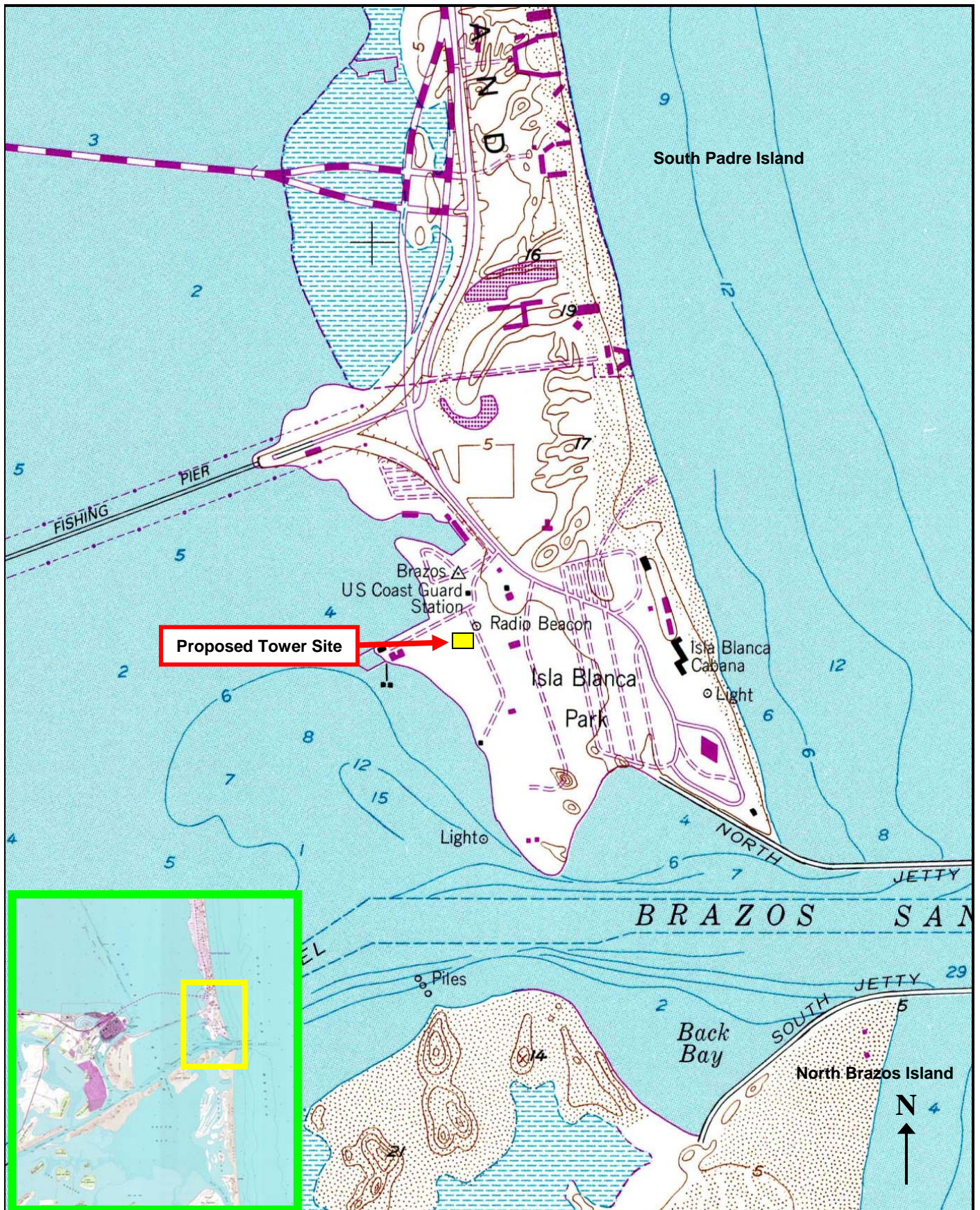
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- Washington, D.C., National Archives, U.S. Coast Guard Records Division, Record Group 26.
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## **APPENDIX A**

### **FIGURES**





PROJECT: RFF South Padre Island, TX

Site Location Map

SCALE: NOT TO SCALE

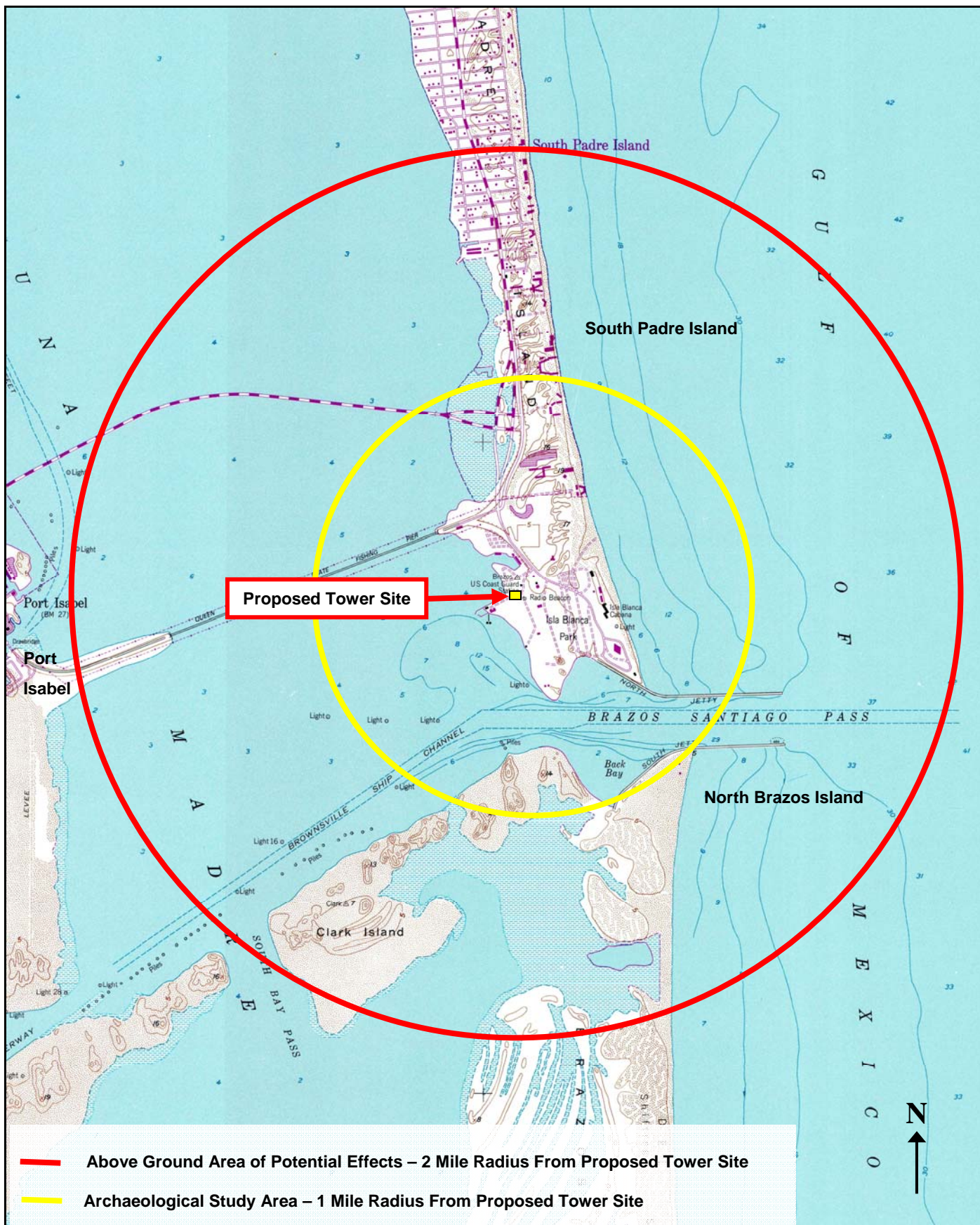
**URS**


PROJECT NO. 15301804.00400

SOURCE: USGS Port Isabel Quadrangle 1:24,000

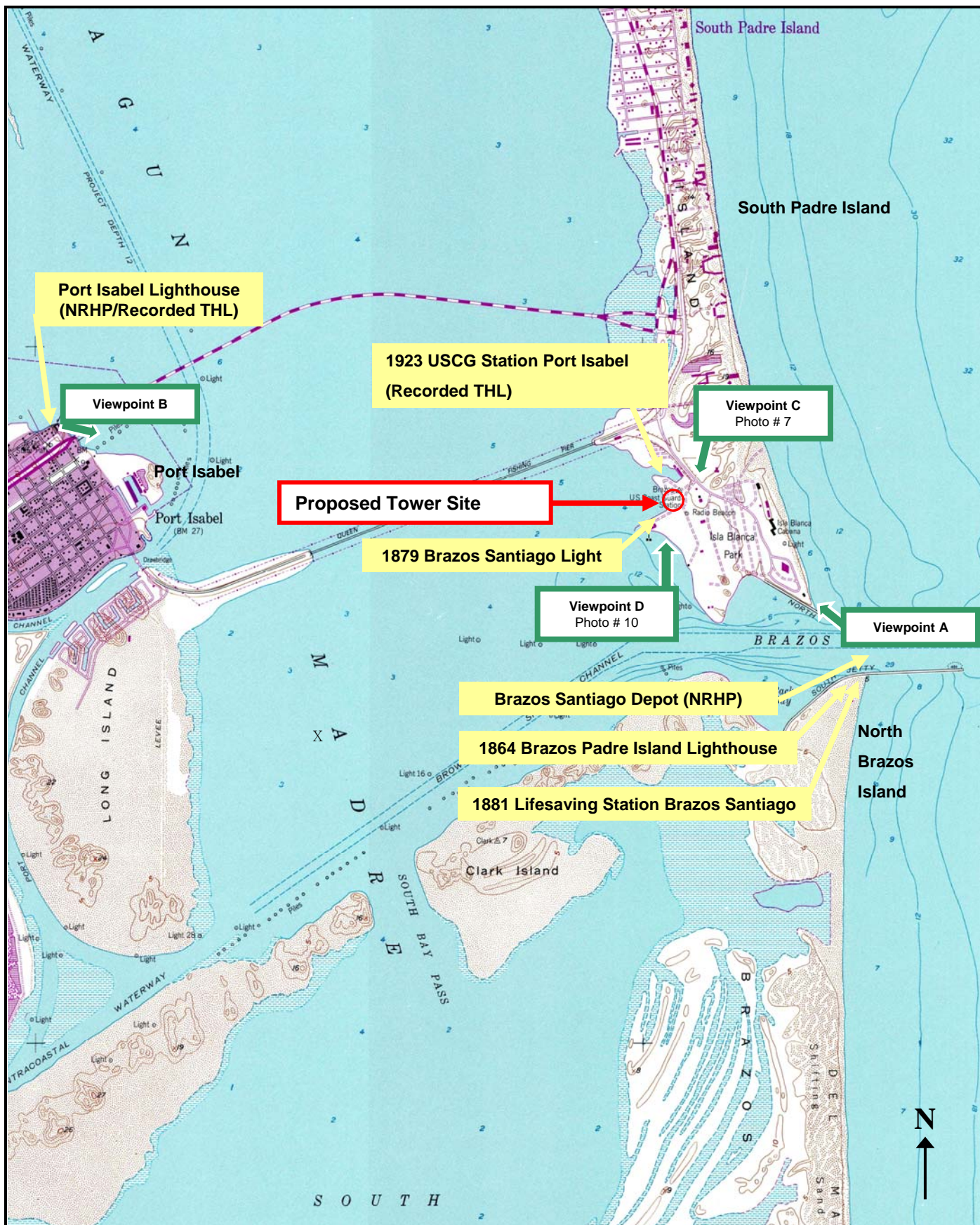
Figure 1






PROJECT: RFF South Padre Island, TX	Area of Potential Effects	
SCALE: NOT TO SCALE		PROJECT NO. 15301804.00400
SOURCE: USGS Port Isabel Quadrangle 1:24,000		Figure 2







PROJECT: RFF South Padre Island, TX	Historic Resources/Critical Viewpoints	
SCALE: NOT TO SCALE		PROJECT NO. 15301804.00400
SOURCE: USGS Port Isabel Quadrangle 1:24,000		Figure 3



**APPENDIX B**  
**PHOTOGRAPHIC LOG**


<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 1	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the northwest			
<b>Description:</b> Critical Viewpoint A – View from the north end of Brazos Island toward proposed tower site			

<b>Photo No.</b> 2	<b>Date:</b> 4-2009	
<b>Direction Photo Taken:</b> View to the northwest		
<b>Description:</b> Critical Viewpoint A – Photo simulation of Photo 1 featuring a painted tower		


<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 3	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the northwest			
<b>Description:</b> Critical Viewpoint A – Photo simulation of Photo 1 featuring an unpainted tower with lights.			

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<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 4	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the southeast			
<b>Description:</b> Critical Viewpoint B – View from the Point Isabel Lighthouse			

<b>Photo No.</b> 5	<b>Date:</b> 4-2009	
<b>Direction Photo Taken:</b> View to the southeast		
<b>Description:</b> Critical Viewpoint B – Photo simulation of photo 4 featuring a painted tower		



<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 6	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the southeast			
<b>Description:</b> Critical Viewpoint B – Photo simulation of photo 4 featuring an unpainted tower with lights			

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<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 7	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the southwest			
<b>Description:</b> Critical Viewpoint C – View from the 1923 USCG Station Port Isabel			

<b>Photo No.</b> 8	<b>Date:</b> 4-2009	
<b>Direction Photo Taken:</b> View to the southwest		
<b>Description:</b> Critical Viewpoint C – Photo simulation of photo 7 featuring a painted tower		

<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 9	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the southwest			
<b>Description:</b> Critical Viewpoint C – Photo simulation of photo 7 featuring an unpainted tower with lights			


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<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 10	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the northeast			
<b>Description:</b> Critical Viewpoint D – View from approximately ½ mile off-shore looking back toward the 1923 USCG Station Port Isabel. Photo is taken from the approximate location of the 1879 Brazos Santiago Light.			

<b>Photo No.</b> 11	<b>Date:</b> 4-2009	
<b>Direction Photo Taken:</b> View to the northeast		
<b>Description:</b> Critical Viewpoint D – Photo simulation of photo 10 featuring a painted tower		




<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 12	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the northeast			
<b>Description:</b> Critical Viewpoint D – Photo simulation of photo 10 featuring an unpainted tower with lights			

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<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> 1 Wallace Reed Road, South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 13	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the southwest			
<b>Description:</b> Photo of proposed tower site, standing at north corner			

<b>Photo No.</b> 14	<b>Date:</b> 4-2009	
<b>Direction Photo Taken:</b> View to the northwest		
<b>Description:</b> Photo of proposed tower site, standing at east corner		

<b>Client Name:</b> U.S. Coast Guard		<b>Site Location:</b> 1 Wallace Reed Road, South Padre Island, TX	<b>Project No.</b> 15301804.00400
<b>Photo No.</b> 15	<b>Date:</b> 4-2009		
<b>Direction Photo Taken:</b> View to the northeast			
<b>Description:</b> Photo of proposed tower site, standing at south corner			

<b>Photo No.</b> 16	<b>Date:</b> 4-2009	
<b>Direction Photo Taken:</b> View to the southeast		
<b>Description:</b> Photo of proposed tower site, standing at west corner		

